

**In The Matter Of:**  
*Kane Marceaux, et al vs.*  
*Lafayette City-Parish Consolidated Government, et al*

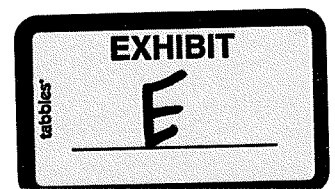
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*Greg Cormier*  
*March 31, 2014*

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Kane Marceaux, et al vs.  
Lafayette City-Parish Consolidated Government, et al

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March 31, 2014

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1 UNITED STATE DISTRICT COURT  
2 WESTERN DISTRICT OF LOUISIANA  
3 LAFAYETTE DIVISION  
4 \* \* \* \* \*  
5 KANE MARCEAUX, GREG  
6 CORMIER, SCOTT POIENCOT, CIVIL ACTION NO:  
7 NOBERT MYERS, GABE THOMPSON, 6:12-CV-01532  
8 REGINA BRISCOE AND ALEETA  
9 M. HARDING JUDGE HAIK, SR.  
10 VERSUS MAG. JUDGE HANNA  
11 LAFAYETTE CITY-PARISH CONSOLIDATED  
12 GOVERNMENT; LAFAYETTE POLICE  
13 DEPARTMENT THROUGH THE LAFAYETTE  
14 CITY-PARISH CONSOLIDATED GOVERNMENT;  
15 LESTER JOSEPH "JOEY" DUREL, JR.  
16 IN HIS CAPACITY AS PRESIDENT OF  
17 THE LAFAYETTE CITY-PARISH  
18 CONSOLIDATED GOVERNMENT; DEE  
19 EDWARD STANLEY, INDIVIDUALLY AND  
20 IN HIS CAPACITY AS CHIEF ADMINISTRATIVE  
21 OFFICER OF THE LAFAYETTE CITY-PARISH  
22 CONSOLIDATED GOVERNMENT; JAMES P.  
23 "JIM" CRAFT, INDIVIDUALLY AND IN  
24 HIS CAPACITY AS CHIEF OF THE  
25 LAFAYETTE POLICE DEPARTMENT, AND  
GEORGE "JACKIE" ALFRED, INDIVIDUALLY  
AND IN HIS CAPACITY AS PATROL DIVISION  
COMMANDER OF THE LAFAYETTE  
POLICE DEPARTMENT  
\* \* \* \* \*  
The deposition of GREG CORMIER was taken in  
the above-entitled cause, pursuant to the  
following stipulations, before Debbie G. Chaney,  
Certified Court Reporter, at The Law Offices of  
Briney, Foret & Corry, 413 Travis Street, Suite  
200, Lafayette, Louisiana, on the 31st day of  
March, and 1st day of April, 2014, beginning at  
10:28 a.m.

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A P P E A R A N C E S

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2  
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9 CONSOLIDATED GOVERNMENT, DEE EDWARD STANLEY,  
10 INDIVIDUALLY, JAMES P. "JIM" CRAFT,  
11 INDIVIDUALLY, AND GORGE "JACKIE" ALFRED,  
12 INDIVIDUALLY  
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23 Baton Rouge, Louisiana 70806  
24 REPRESENTING PLAINTIFFS  
25 (Waived Appearance)  
  
ALSO PRESENT:  
(3/31/14) Mr. Gabe Thompson, Mr. Uletom Hewitt,  
Mr. Novey Stelly  
(4/1/14) Mr. Novey Stelly, Mr. Uletom Hewitt

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S T I P U L A T I O N S

1  
2  
3 It is stipulated and agreed by and between  
4 counsel for the parties that the deposition of  
5 GREG CORMIER, is hereby taken for discovery  
6 purposes and all other purposes allowable under  
7 the Federal Rules of Civil Procedure.  
8  
9 That the witness reserves the right to read and  
10 sign the deposition;  
11  
12 That all formalities of sealing, certifying  
13 and filing are waived.  
14  
15 That all objections, except those as to the  
16 form of the question and the responsiveness of  
17 the answer, are reserved until such time as this  
18 deposition or any part thereof may be used or  
19 sought to be used in evidence;  
20  
21 That, Debbie G. Chaney, Certified Court  
22 Reporter officiated in administering the oath to  
23 the above-mentioned witness.  
24  
25

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1 GREG CORMIER,  
2 after being first duly sworn, was examined and  
3 testified as follows:  
4 THE WITNESS:  
5 I do.  
6 EXAMINATION (3/31/14)  
7 BY MR. CORRY:  
8 Q Mr. Cormier, can you start off by giving us  
9 your full name and address for the record,  
10 please?  
11 A Gregory John Cormier, 553 Miller Road,  
12 Opelousas, Louisiana 70570.  
13 Q You said Miller, M-i-l-l-e-r?  
14 A That's correct.  
15 Q Okay. As you know, I'm Michael Corry. I'm  
16 here to take your deposition in connection  
17 with the federal lawsuit that you and some  
18 other officers have filed.  
19 I'm sure you've been deposed previously.  
20 A Yes.  
21 Q How many times do you think you've been  
22 deposed in your career?  
23 A I can't give you a figure. Two or three,  
24 maybe.  
25 Q Okay. Just let me finish the question. I

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1 for you.  
2 Like I did with the other officers, I'm  
3 going to take you through some background,  
4 some employment, education. And then, we'll  
5 go specifically to the documents.  
6 MR. CORRY:  
7 And before we started, for purposes  
8 of the record, there was an initial set  
9 of discovery that consisted of pages 1  
10 through 139, that we Bates stamped, GC-1  
11 through 139.  
12 Then, there was a supplemental set  
13 of documents that was produced to us at  
14 one of the depositions, a binder was  
15 left for us, and it goes 140 through  
16 577.  
17 And then, Friday, there was  
18 supplemental responses that were  
19 forwarded to us via e-mail, and we've  
20 marked that GC-560 through GC-577.  
21 Before we started, Mr. Cormier went  
22 through the binder that I had produced  
23 or put together for him to use during  
24 this deposition, which consisted of all  
25 three sets of his discovery responses.

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1 think you were here -- if you need some  
2 paper, I can get you a pad of paper.  
3 You were here for some of the other  
4 depositions. Just let me just finish the  
5 question. I will allow you to respond before  
6 I ask the next question.  
7 Please respond out loud. Make sure you  
8 say yes or no, feel free to explain your  
9 answer. But we can't say uh-huh, uh-uh, or  
10 nod our head, because the Court Reporter  
11 sitting here is taking everything down and  
12 she can't do that.  
13 When we finish the deposition, you will  
14 have the right to read and sign the  
15 deposition. If you choose to exercise that  
16 right, you will have to get with the Court  
17 Reporter, and she will make arrangements to  
18 provide it to you to read and sign it.  
19 MR. SPRING:  
20 He wants to read and sign it.  
21 MR. CORRY:  
22 Okay.  
23 MR. CORRY:  
24 Q If at any time you need to take a break, tell  
25 me and we'll will be happy to take a break

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1 And near the area of GC-237, it's  
2 his belief that his four-page, December  
3 8th, 2010, transfer was somehow not  
4 included in the binder, and a one-page,  
5 April 29th, 2011. So we will address  
6 those documents. I'll ask him questions  
7 about them, and we can just attach them  
8 at the end.  
9 There were also a couple of sets of  
10 additional documents that Mr. Cormier  
11 felt were not in the binder. And we'll  
12 go through those and identify them. And  
13 we can attach those, or deal with them  
14 at the appropriate time.  
15 MR. CORRY:  
16 Q How long have you lived at the Miller  
17 address, Mr. Cormier?  
18 A 12 years.  
19 THE WITNESS:  
20 Before we go any further, what's  
21 your name, ma'am?  
22 MR. CORRY:  
23 Hallie.  
24 MS. COREIL:  
25 Hallie Coreil.

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1 THE WITNESS:  
2 Ms. Coreil.  
3 A And I know you, Mr. Corry. I have a little  
4 housecleaning before we go any further.  
5 On February 17th, when Kane Marceaux  
6 started his initial deposition, the 18th and  
7 the 19th, there were officers with the  
8 Lafayette Police Department that were armed  
9 and outside of your door. Can you tell me,  
10 number one, why they were there, and who made  
11 that decision for them to be there, and is  
12 that normal protocol?  
13 MR. CORRY:  
14 Q Well, first of all, this is a deposition and  
15 I'm asking the questions.  
16 A I --  
17 Q So -- (Interrupted)  
18 A I need you to answer that. Because, number  
19 one, it was insulting and intimidating, for  
20 number one. And are they there now?  
21 Q There's nobody sitting in the lobby there.  
22 A There's a marked -- unmarked Dodge Charger  
23 that's out there right now.  
24 Q You're sworn to answer my questions today.  
25 A I'm --

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1 Q Okay. Anybody else reside there with you?  
2 A Yes. A daughter.  
3 Q I'm sorry?  
4 A A daughter.  
5 Q What's her name and age?  
6 A Ciesley Cormier, ten.  
7 Q Okay. Anybody else?  
8 A That's it.  
9 Q What is your date of birth?  
10 A 10/5/66.  
11 Q How old does that make you?  
12 A 47.  
13 Q And your driver's license number?  
14 A 5239511.  
15 Q Has your license ever been suspended or  
16 revoked for any reason?  
17 A No.  
18 Q And your Social? And we'll just put the last  
19 four digits on the record.  
20 A XXX-XX-2087.  
21 Q Okay. Where did you reside prior to  
22 Opelousas?  
23 A 200 High Meadows Boulevard.  
24 Q Lafayette?  
25 A Apartment 235, Lafayette.

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1 Q If you don't want to do that, tell me you  
2 don't want to do it.  
3 A I'm quite aware of that, Mr. Corry --  
4 Q I'm not under oath, and I'm not answering  
5 questions.  
6 MR. CORRY:  
7 So what do you want to do, Steve?  
8 MR. SPRING:  
9 What Michael is telling you is  
10 correct.  
11 A All right. Let's proceed.  
12 MR. CORRY:  
13 Q How long have you lived at the Miller Road  
14 address?  
15 A Approximately 12 years.  
16 Q Okay. And who resides there with you?  
17 A My wife, Colette Cormier.  
18 Q Anyone else?  
19 A Son, Ian Cormier.  
20 Q How old is Ian?  
21 A 17.  
22 Q And does your wife work outside the home?  
23 A Yes.  
24 Q Where?  
25 A AT&T.

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1 Q And how long were you there?  
2 A I can't give you an exact number. I was  
3 there twice.  
4 Q Are you originally from Lafayette Parish?  
5 A No.  
6 Q Where are you originally from?  
7 A St. Martin Parish.  
8 Q And how long have you been in Lafayette  
9 Parish?  
10 A 1986, I would say.  
11 Q Was that in conjunction with finishing high  
12 school, I guess?  
13 A What?  
14 Q When you moved to Lafayette from St.  
15 Martinville?  
16 A Yes.  
17 Q What year did you graduate from high school?  
18 A 1984.  
19 Q St. Martinville High?  
20 A Yes.  
21 Q Are you on any prescription medication today?  
22 A Yes.  
23 Q What?  
24 A Exforge.  
25 Q I'm sorry?



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1 A Exforge, E-x-f-o-r-g-e.  
2 Q And what is that for?  
3 A Blood pressure.  
4 Q Is that affecting your ability to hear and  
5 understand and answer my questions?  
6 A No.  
7 Q Who prescribes that for you?  
8 A Dr. Alemany.  
9 Q Are you on any other medication?  
10 A No.  
11 Q How long have you been on this medication?  
12 A 2013, sometime.  
13 Q Is that when you were diagnosed with high  
14 blood pressure?  
15 A By who?  
16 Q Dr. Alemany.  
17 A Okay. Yes.  
18 Q Have you ever taken prescription blood  
19 pressure medication prior to the Exforge  
20 prescribed by Dr. Alemany --  
21 A No.  
22 Q -- at any time in your life?  
23 A No.  
24 Q Has any health care provider diagnosed you  
25 with any type of blood pressure issue, high

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1 Alemany?  
2 A Patrick Moore.  
3 Q And where is he located?  
4 A Lafayette.  
5 Q Is he with a particular group?  
6 A Moore Health Group.  
7 Q Where is that located?  
8 A In Lafayette, off of Moss Street. I can't  
9 give you exact numericals.  
10 Q How long have you seen Dr. Alemany?  
11 A Since last year.  
12 Q 2013?  
13 A Yes.  
14 Q Is there any particular reason you switched  
15 from Moore to Dr. Alemany?  
16 A Out of convenience.  
17 Q How long had you seen Moore?  
18 A Since the latter part of 2012.  
19 Q And what did you go see Moore for?  
20 A Annual checkup.  
21 Q Is there a particular time of year you go for  
22 your annual checkup?  
23 A The latter part of the year.  
24 Q How many times have you seen Moore?  
25 A I can't give you an exact amount, Mr. Corry.

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1 blood pressure, anything in your life, prior  
2 to Dr. Alemany?  
3 A You're talking about me personally, that I  
4 saw, or --  
5 Q Yes, sir.  
6 A -- outside the realm of that?  
7 Q No. Somebody that you saw.  
8 A No.  
9 Q Where is Dr. Alemany?  
10 A He has two offices. His first name is a  
11 Fernando.  
12 One in Lafayette, and one in Opelousas.  
13 Q Do you see him at the Opelousas or Lafayette  
14 address?  
15 A Opelousas.  
16 Q And how do you spell his last name?  
17 A Your guess is as good as mine.  
18 Q He is Spanish?  
19 A I don't know his ethnicity, Mr. Corry.  
20 Q And what type of doctor is he?  
21 A I guess general practitioner, I think.  
22 Q And what was the reason you went to see Dr.  
23 Alemany?  
24 A Annual physical.  
25 Q Who was your family doctor prior to Dr.

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1 Probably once or twice a year, maybe.  
2 Q Okay. You saw him -- and correct me if I'm  
3 wrong. I thought you told me the first time  
4 you had been him was the latter part of 2012.  
5 A Uh-huh (yes).  
6 Q That's correct?  
7 A Yes.  
8 Q Okay. And you've seen him once or twice  
9 since then?  
10 A Yes.  
11 Q For what?  
12 A Follow up.  
13 Q Okay. Was there a reason he told you that  
14 you needed to come back?  
15 A Monitor my pressure, make sure it was at an  
16 appropriate level.  
17 Q Monitor your what?  
18 A Blood pressure.  
19 Q Blood pressure.  
20 Was there an issue that he was  
21 addressing?  
22 A No.  
23 Q Do you have any other health conditions other  
24 than high blood pressure?  
25 A No.

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1 Q Who did you see prior to Dr. Moore as your  
2 family doctor, or general practitioner?  
3 A No one in particular, other than Dr. Swan.  
4 Periodically, I would see him.  
5 Q And who is Dr. Swan?  
6 A I guess he's a general practitioner here in  
7 Lafayette.  
8 Q Was the reason you saw Dr. Swan in connection  
9 with your employment with the Lafayette  
10 Police Department, or was it separate, on  
11 your own?  
12 A Employment with the Lafayette Police  
13 Department.  
14 Q Were you required to get an annual physical  
15 with Swan?  
16 A No.  
17 Q When did you start getting annual physicals?  
18 A I guess after 2012, when the issue of a  
19 racing heart beat came up.  
20 Q And what issue is that you're referring to?  
21 A I guess when I was diagnosed with a racing  
22 heart beat by Chief Jim Craft, Joey Provost  
23 and Dwayne Prejean.  
24 Q Do you remember the date of that?  
25 A I guess it would be the date of my -- the

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1 A I'm referring to the polygraph examination  
2 unit consent to be polygraphed.  
3 Q Is that a one-page document or two?  
4 A It's one page.  
5 Q One page. Okay. GC-391. All right.  
6 So at that point, you -- you can leave  
7 it open, because we're going to be referring  
8 to it a bunch.  
9 At that point, you felt it necessary to  
10 seek the services of a health care provider,  
11 a health care professional?  
12 A No, not really. The reason I went there was,  
13 you know, pretty much dispute what they were  
14 claiming.  
15 Q And that's Dr. Swan that you went to?  
16 A Initially, yes.  
17 Q And what did you complain to Dr. Swan was  
18 your issue, if anything?  
19 A It wasn't a complaint. I just went there for  
20 an overall physical in order for him to  
21 pretty much diagnose if I had a racing heart  
22 beat or not.  
23 Q Okay. And what did he diagnose?  
24 A That I was perfectly fine.  
25 Q All right. And I don't know if I asked

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1 initial polygraph that I was scheduled to go  
2 in. Let me refer to my notes to get an exact  
3 date.  
4 Q And it might be -- well, it will be -- I  
5 mean, you're welcome to look at your notes.  
6 MR. CORRY:  
7 Steve, but for the record, I've got  
8 these Bates stamped.  
9 MR. CORRY:  
10 Q So I need you to find it in here so we can  
11 identify it for the record. Because we're  
12 not going to be able to identify it just out  
13 of your book.  
14 Like I said, this should be in the same  
15 order as your binder.  
16 A Should. That's the key word.  
17 8/14/12.  
18 MR. SPRING:  
19 What's the page number on that?  
20 THE WITNESS:  
21 Page number is GC-391.  
22 MR. SPRING:  
23 Thank you.  
24 MR. CORRY:  
25 Q And what is that you're referring to?

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1 before we started. Is anybody recording this  
2 deposition?  
3 MR. SPRING:  
4 No.  
5 MR. CORRY:  
6 Q When, in relation to the August 14th, '12  
7 date did you see Swan?  
8 A I saw Swan after, if I'm not mistaken.  
9 (Witness examines his document.)  
10 Q And I don't need an accurate. I mean, it  
11 doesn't have to be exact.  
12 A Okay. Because --  
13 Q We're going to go through all the documents,  
14 and if we come to it and you want to make a  
15 reference to it, we can.  
16 A Okay.  
17 Q But in order to try to keep it moving along.  
18 And I know it's not an exact date.  
19 Was it within a day or two, was it  
20 within a couple of days, a couple of weeks,  
21 or what is your recollection?  
22 A I would say probably a week or two.  
23 Q Okay.  
24 A Let me elaborate on that. The reason I was  
25 placed on administrative leave for that

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1 racing heart beat. And thereafter, I sought  
2 the assistance of Dr. Swan. As a matter of  
3 fact, it was August 27th, 2012.  
4 Q Okay. And what are you referring to that  
5 refreshes your memory?  
6 A I'm referring to --  
7 Q GC?  
8 A -- GC-398.  
9 Q And what is that?  
10 A That is a Lafayette Consolidated Government  
11 Doctor's Certificate/Medical Status Report.  
12 Q All right. When you were placed on  
13 administrative leave, it was paid  
14 administrative leave?  
15 A Yes.  
16 Q And you were, in fact, paid?  
17 A Yes.  
18 Q All right. So that's the first time -- do  
19 you mind if I call you Greg, or would you  
20 prefer I call you Mr. Cormier?  
21 A It doesn't matter, Mr. Corry.  
22 Q And you can call me Michael, that's fine.  
23 Prior to seeing Dr. Swan and the  
24 reference to the racing heart beat, you had  
25 never seen any health care provider for

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1 racing heart beat, high blood pressure,  
2 anything to do with your heart?  
3 A No.  
4 Q Who did you see as a family doctor before  
5 Dr. Swan?  
6 A Actually, none. It was mostly Dr. Swan.  
7 Q If you had an ailment, you'd develop a cold,  
8 or a cough, or the flu, or something, while  
9 you were employed with LPD, let's say you  
10 woke up one night, you weren't scheduled to  
11 be at work, and you felt bad, would you  
12 always go through someone with LPD, or would  
13 you just go out to your own doctor? How did  
14 that work for you?  
15 A Apart from injuries on duty, I don't recall  
16 ever having that instance that you're  
17 referring to. That's an area -- Mr. Corry, I  
18 was there for 22-1/2 years, I only missed two  
19 days of work.  
20 Q Okay. So you could seek medical treatment  
21 with anyone you wanted to, and your health  
22 insurance with the city would pay for it? It  
23 didn't have to be at Dr. Swan or someone  
24 related to the city; is that accurate, if you  
25 needed to see the doctor?

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1 A Somewhat, yes.  
2 Q How is it not?  
3 A Because the city doesn't just pay for it like  
4 that. There's a process that you go through.  
5 And depending on the injury, and --  
6 Q And I'm not talking about an on-the-job  
7 injury, I'm talking about -- (Interrupted)  
8 A I'm talking about off duty.  
9 Q What?  
10 A I'm talking about off duty.  
11 Q Okay. You had benefits with the city, right?  
12 A That's correct.  
13 Q Okay. I assume you have never been arrested  
14 for anything.  
15 A No.  
16 Q Never been treated for alcohol or drug  
17 abuse?  
18 A No.  
19 Q Ever been treated for any type of  
20 psychological or psychiatric condition?  
21 A No.  
22 Q Have you ever served in the military?  
23 A Yes.  
24 Q What years, and what branch?  
25 A December 26th, 1984, until April 16th, if I'm

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1 not mistaken, 1991.  
2 Q And what branch were you in?  
3 A United States Marine Corps.  
4 Q And honorable discharge?  
5 A Yes.  
6 Q What was your rank?  
7 A Sergeant.  
8 Q Were you -- did you ever suffer any type of  
9 injuries in the military?  
10 A Other than a sprained ankle, no.  
11 Q And where were you stationed through your  
12 career? Why don't you take me from when you  
13 started out to where you completed?  
14 A December 26th, 1984, I was stationed at  
15 MCRTD, Marine Corps Recruit Training Depot,  
16 Camp Pendleton -- I mean, I'm sorry -- in San  
17 Diego, California. I completed basic  
18 training March 15th, 1985.  
19 From there, I went to Camp Lejeune,  
20 North Carolina, Infantry Training School.  
21 From there, I left from there, went to  
22 nuclear biological chemical warfare school,  
23 Fort McClellan, Alabama.  
24 From there, I went to advanced nuclear  
25 biological chemical warfare school in Cherry

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1 Point, North Carolina.  
2 Do you actually want me to continue  
3 going through all of that?  
4 Q Well, just -- did you ever serve in any  
5 combat?  
6 A Yes.  
7 Q Where?  
8 A Operation Desert Storm, Desert Shield.  
9 Q That was Desert Storm I?  
10 A Yes.  
11 Q And where were you stationed when you were  
12 discharged?  
13 A TOW Platoon, 23rd Marines, Broussard,  
14 Louisiana.  
15 Q You were in the reserve for a period of time?  
16 A Yes.  
17 Q How long?  
18 A Probably 1986 until 1991.  
19 Q Do you have any type of marine corps  
20 retirement? Did you qualify for that?  
21 A I don't know. I never sought looking into  
22 that yet.  
23 Q So '84 to '91. '91 included the reserves?  
24 A Yes.  
25 Q The five years of reserve. Is that accurate?

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1 Q So you, along with your other --  
2 A Employees.  
3 Q -- officers under you were sued?  
4 A Correct.  
5 Q Do you remember the name of that suit, the  
6 caption, or who the officer -- excuse me, who  
7 the decedent was?  
8 A I want to say it's Daniel Harmon, but I might  
9 be mistaken. Or Damion Harmon.  
10 Q And what was the outcome of that?  
11 A I don't know.  
12 Q Is it still pending?  
13 A I don't know. We gave a deposition at city  
14 hall, and that was the extent of it.  
15 Q Who took your deposition?  
16 A I don't even remember the attorney's name,  
17 Mr. Corry, to be honest with you.  
18 Q I guess it was the attorney representing the  
19 family of Mr. Harmon, if that's his name?  
20 A Pretty much, yeah.  
21 Q Who was the city attorney?  
22 A (Witness shakes head negatively.)  
23 Q Don't remember? Okay.  
24 And then, the other two were traffic  
25 crashes? They were traffic crashes you were

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1 A Pretty much, correct.  
2 Q You said you had given a deposition two or  
3 three times, you think, prior to this one.  
4 Was that in conjunction with your employment  
5 with the Lafayette Police Department?  
6 A Yes.  
7 Q And what was the nature of those depositions?  
8 A One was a -- I guess you can say a wrongful  
9 death suit, and the other two were traffic  
10 crashes.  
11 Q Do you know when the wrongful death suit was,  
12 roughly?  
13 A 2000 -- I'd say anywhere from 2007 to maybe  
14 2009, at the most.  
15 Q And someone died? What was the nature of  
16 that suit?  
17 A A gentleman's family members sued the police  
18 department. I was the supervisor on the  
19 street and narcotics team, and we encountered  
20 that same subject. He took off running,  
21 ingested a plastic -- some marijuana that was  
22 wrapped in some plastic, and I guess he  
23 aspirated on it.  
24 Q And it killed him?  
25 A Yes.

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1 involved in, or traffic crashes that you  
2 investigated?  
3 A Investigated.  
4 Q And I guess those were way back in your  
5 career?  
6 A Yes.  
7 Q Other than this lawsuit and the TRO lawsuit  
8 that was filed in the Fifteenth Judicial  
9 District, and I don't recall specifically off  
10 the top of my head if you were parties to any  
11 of the mandamus proceedings. Were you? I  
12 think it was just Mr. Marceaux.  
13 A It was Mr. Marceaux and Mr. Hewitt, that's --  
14 that's it.  
15 Q Okay. Other than the TRO and the federal  
16 lawsuit that we're here for today, have you  
17 ever been active as a plaintiff in a lawsuit?  
18 A No.  
19 Q So those two are the only two lawsuits that  
20 you've been -- that have been filed on your  
21 behalf?  
22 A Correct.  
23 Q And I'm talking about either through your  
24 employment with Lafayette Police Department,  
25 or any other place you may have worked, or

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1 anything personal. Those are the only two  
2 lawsuits?  
3 A Correct.  
4 Q All right. Have you ever been sued as a  
5 defendant, other than the wrongful death  
6 lawsuit back in somewhere around '07 or '09,  
7 involving someone we think was named Harmon?  
8 A When you say "sue", what are you referring  
9 to? As far as any --  
10 Q Where you have been named as a defendant.  
11 A Yes.  
12 Q Okay. Tell me about those.  
13 A I guess you would say when you filed  
14 paperwork for us violating the protective  
15 order. Would that be considered that?  
16 Q No. Not -- you're a party to the federal  
17 lawsuit.  
18 A Okay.  
19 Q Where you are a separate -- (Interrupted)  
20 A I'm sorry. I'm sorry, I cut you off. Go  
21 ahead.  
22 Q Where you have been named actually as a  
23 defendant.  
24 A No.  
25 Q Have you ever made any claims against anyone

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1 A Initially, yes.  
2 Q Did you make a claim for personal injuries?  
3 A No.  
4 Q Roughly, what year was that?  
5 A '94, '95, maybe.  
6 Q Any other claims that you have had to make?  
7 A No.  
8 Q Have you ever filed for any type of  
9 disability, either through a federal or state  
10 agency, or a private insurer?  
11 A No.  
12 Q Have you ever filed for unemployment?  
13 A No.  
14 Q Have you ever filed for bankruptcy?  
15 A No.  
16 Q How long have you and Ms. Colette been  
17 married?  
18 A It'll be 23 years this October 5th.  
19 Q Have you been married to anyone other than  
20 Ms. Colette?  
21 A Not that I'm aware of.  
22 Q Do you have any other children other than Ian  
23 and Ciesley?  
24 A No, sir.  
25 Q How long has Ms. Colette been employed at

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1 where maybe a lawsuit was not necessary,  
2 claims against an insurance company, or  
3 something like that?  
4 A Yes.  
5 Q Tell me about that.  
6 A I can't give you the exact date. I was still  
7 in patrol. I was leaving city court. At the  
8 intersection -- I can't remember the street  
9 offhand. But Don's Seafood is right at that  
10 intersection, downtown. And an elderly  
11 gentleman ran the red light and broadsided  
12 me.  
13 Q And you were injured?  
14 A Yes.  
15 Q And you made a claim against an insurance  
16 company, but you didn't have to file a  
17 lawsuit?  
18 A I made a claim as far as repairing my  
19 vehicle, but that was the extent of it.  
20 Q Were you in your police vehicle, or your  
21 personal vehicle?  
22 A Personal.  
23 Q Did you have to obtain an attorney?  
24 A Initially, yes.  
25 Q I'm sorry?

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1 AT&T?  
2 A 12, 13 years, I want to say.  
3 Q Okay. You told me you graduated from St.  
4 Martinville High School in '86?  
5 A '84.  
6 Q '84.  
7 Tell me about your education after that  
8 point. Have you had any education?  
9 A Yes.  
10 Q Other than perhaps the military, from '84 to  
11 '91?  
12 A Yes.  
13 Q What?  
14 A A Bachelor's Degree.  
15 Q BA or BS?  
16 A BS.  
17 Q In?  
18 A Criminal justice.  
19 Q What year?  
20 A 1989.  
21 Q And where did you obtain that?  
22 A University of Southwestern Louisiana.  
23 Q Any other education?  
24 A No.  
25 Q When did you get into law enforcement?



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1 A June 25th, 1990.  
2 Q And where did you start out working?  
3 A Lafayette City Police.  
4 Q When did you start UL, when you got out of,  
5 or Southwestern -- when you got out of the  
6 military?  
7 A In between.  
8 Q While you were on the reserve, you were  
9 going?  
10 A Yes.  
11 Q Were you employed -- did you ever hold any  
12 jobs other than, you know, college type of  
13 job, prior to going to work for the LPD on  
14 June 25th, 1990?  
15 A Yes.  
16 Q What?  
17 A Lafayette Community Correctional Center.  
18 Q An employee of the sheriff?  
19 A No. I think it was -- at that time, it was  
20 through the Louisiana Department of  
21 Corrections.  
22 Q It was the Lafayette Community what?  
23 A Correctional Center.  
24 Q Is that what we know as the jail now?  
25 A No, sir.

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1 Lafayette Police Department, which would be  
2 '90.  
3 Q What about at the post office?  
4 A I would guess -- I would venture to say '87  
5 till about '89.  
6 Q You stopped working there when you went to  
7 work for the correctional center?  
8 A That's correct.  
9 Q Okay. Any other employment?  
10 A No.  
11 Q Do you hold any certificates or licenses,  
12 other than your driver's license, high school  
13 diploma and college diploma?  
14 A Currently?  
15 Q Yes.  
16 A No.  
17 Q Have you ever held any?  
18 A Yes.  
19 Q What?  
20 A Some that -- I can't disclose that, that's  
21 military.  
22 Q All right. Would you refer to that as while  
23 you were employed -- while you were in the  
24 military, you had certain -- what would you  
25 refer to it in the military? Not as a

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1 Q Where was that located?  
2 A That was the halfway house. It was -- I  
3 think the address was 120 Chestnut Street,  
4 South Chestnut Street.  
5 Q Okay. And how long were you employed there?  
6 A Maybe six months to a year, I would say.  
7 Q It was a full-time job?  
8 A Yes.  
9 Q And what was your position?  
10 A Resident supervisor.  
11 Q I guess it was for individuals who perhaps  
12 had criminal issues and/or drug or alcohol  
13 related issues, would stay there until they  
14 could acclimate back into society? Is that  
15 -- (Interrupted)  
16 A Correct. It was a halfway house.  
17 Q Okay. Any other employment prior to LPD?  
18 A University Post Office.  
19 Q What did you do there?  
20 A Mail sorter.  
21 Q While you were in school?  
22 A Yes.  
23 Q What year were you at the correctional  
24 center?  
25 A 1989, up until my employment with the

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1 certificate or license. Like clearance to do  
2 certain things. Is that what you're  
3 referring to, something like that?  
4 A Military occupational specialist is what it  
5 was called.  
6 Q Okay. You started the Lafayette Police  
7 Department on June 25th of '90. Were you  
8 sent for training at that time?  
9 A Yes.  
10 Q Where?  
11 A Acadiana Law Enforcement Training Academy.  
12 Q How long was that course?  
13 A Eight weeks.  
14 Q Who was the chief when you were hired?  
15 A Gary Copes.  
16 Q And did you complete the eight-week training?  
17 A Yes.  
18 Q Where were you assigned?  
19 A What do you mean?  
20 Q Tell me what -- after you finished your  
21 eight-week training, where did you go from  
22 there?  
23 A FTO, field training officer program.  
24 Q And how long did you -- were with the FTO?  
25 A Three months.



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1 Q Were you with the same FTO?  
2 A No, sir.  
3 Q Who were you with?  
4 A I started off with Dale Hewitt, Bruce Simien.  
5 Q I'm sorry?  
6 A Bruce Simien, and McCullen Gallien.  
7 Q That's who they refer to as Mac Gallien?  
8 A Yes.  
9 Q Are those three officers still with the  
10 LPD?  
11 A No. I'm not finished.  
12 Q Oh, I'm sorry. Go ahead.  
13 A Upon my return from Desert Storm, Desert  
14 Shield, Norbert Myers.  
15 Q So during your FTO, you were called upon to  
16 serve in the military?  
17 A Actually, I was -- I had completed the FTO  
18 program and was activated.  
19 Q Okay. And I guess when you came back, they  
20 wanted to refresh you with an FTO, so you  
21 went with Myers?  
22 A Yes. It was a one-month reacclimation  
23 process.  
24 Q How long did you have to go serve in Desert  
25 Storm?

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1 A That's correct.  
2 Q Okay. And then, did you work continuously,  
3 from June of '91, up through the point of  
4 your termination for the LPD?  
5 A Correct.  
6 Q Did you ever get called out at any other time  
7 by the military?  
8 A No.  
9 Q Okay. Where were you first assigned when you  
10 finished your one month with Norbert Myers?  
11 A I was assigned to Shift D, 400 shift.  
12 Q What does that mean in laymen's terms?  
13 A Shift D, night shift. But it was a rotating  
14 shift.  
15 Q So you worked -- (Interrupted)  
16 A You worked pretty much two weeks days, and  
17 then two weeks nights.  
18 Q And Shift D was where, that's the location of  
19 the city?  
20 A That's -- it was the north side, now it's  
21 called Upper Lafayette.  
22 Q And who was your -- I guess when you start,  
23 what is your position? What do they refer to  
24 you as?  
25 A Patrol officer.

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1 A November 28th, 1990, April 16th, 1991.  
2 Q You were in Kuwait?  
3 A No. Not all the time.  
4 Q Where else were you?  
5 A (No response)  
6 Q You can't tell me?  
7 A No, sir.  
8 Q What would happen if you did?  
9 A You would lose your law license, the federal  
10 judge would have some issues.  
11 Q Okay. So you came back on April 16th of '91.  
12 When did you return to the LPD?  
13 A It was in the summer. I can recall that. I  
14 would say June, something like that.  
15 Q And was the two-month off something you chose  
16 to take sometime off, or was that something  
17 that the LPD provided to you? Or how did  
18 that work?  
19 A They basically reached out to me and told me  
20 whenever I'm ready to come back --  
21 Q Okay.  
22 A -- I can come back, be it one week after my  
23 return, or three months, or four months.  
24 Q Okay. And you just wanted to take some time  
25 off?

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1 Q And how long did you work as a patrol officer  
2 on Shift D, 400 shift?  
3 A Maybe two years.  
4 Q And who was your sergeant?  
5 A Sergeant Eugene Woods.  
6 Q Do you remember your lieutenant, captain,  
7 major?  
8 A I don't know. I don't remember the  
9 lieutenant. The captain was Francis Mouton,  
10 and the major was Major Ralph Peters.  
11 Q I think I asked you, and then, I cut you off.  
12 I don't think you answered.  
13 The FTO officers that you rode with, are  
14 they still employed with the Lafayette Police  
15 Department? Hewitt, Simien, Gallien and  
16 Myers. I know Myers is not.  
17 A No, none of them.  
18 Q None of them are?  
19 A No.  
20 Q All right. Where did you go after you worked  
21 two years in patrol for Shift D, 400 shift?  
22 A I went to Shift C.  
23 Q What part of the city is that?  
24 A The alphabet doesn't designate what part. I  
25 was working central.

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<p>1 Q Which shift?</p> <p>2 A Shift C.</p> <p>3 Q So days and nights?</p> <p>4 A Uh-huh (yes).</p> <p>5 Q It was the same?</p> <p>6 A The same.</p> <p>7 Q When did that change, the rotating shift, do</p> <p>8 you remember?</p> <p>9 A What do you mean? Change from --</p> <p>10 Q Where you worked two weeks nights to two</p> <p>11 weeks days?</p> <p>12 A From -- if my memory serves me correct, the</p> <p>13 rotation would switch every pay period cycle.</p> <p>14 Q Y'all were paid twice a month?</p> <p>15 A Correct.</p> <p>16 Q But at some point, the LPD did away with the</p> <p>17 rotating shifts, correct?</p> <p>18 A Yes.</p> <p>19 Q When was that?</p> <p>20 A I can't give you an exact date on that.</p> <p>21 Q Was it within the past five years?</p> <p>22 A Longer than that.</p> <p>23 Q Longer than that?</p> <p>24 A Yes.</p> <p>25 Q Before Craft was the chief?</p>	<p>1 A Yes.</p> <p>2 Q Do you remember who the chief was that did</p> <p>3 away with the rotating shifts?</p> <p>4 A If I'm not mistaken, I think it was Chief</p> <p>5 Crenshaw.</p> <p>6 Q And do you recall the reason?</p> <p>7 A I think he had did a sample poll, and the</p> <p>8 overwhelming majority preferred working a set</p> <p>9 shift, as far as days or nights. And I guess</p> <p>10 there was an echo or process, and they split</p> <p>11 them working days and nights. And thus,</p> <p>12 forward from there, everybody worked either</p> <p>13 set days or set nights.</p> <p>14 Q Okay. What did you prefer?</p> <p>15 A Nights.</p> <p>16 Q So when some officers take issue with being</p> <p>17 transferred to a night shift, for Greg</p> <p>18 Cormier, that was actually something you</p> <p>19 preferred. And I guess you weren't alone. I</p> <p>20 guess there were a number of officers that</p> <p>21 preferred working nights.</p> <p>22 A Not really. You asked me that question, what</p> <p>23 do I prefer. But I can work days or nights.</p> <p>24 But when you're referring to that,</p> <p>25 transferring to night shift was a punishment</p>
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<p>1 when they would transfer you.</p> <p>2 Q When it started, though, with Chief Crenshaw,</p> <p>3 I guess half of the officers had to decide on</p> <p>4 nights, and half had to decide on days,</p> <p>5 correct?</p> <p>6 A Correct.</p> <p>7 Q Do you have as many officers working nights</p> <p>8 as you do days?</p> <p>9 A I can't tell you the manpower. Floor chart</p> <p>10 right now, Mr. Corry, I wouldn't be able to</p> <p>11 answer that question.</p> <p>12 Q Okay. Back when Crenshaw made the change,</p> <p>13 though, do you recall roughly, was it equal,</p> <p>14 or I guess at night -- correct me if I'm</p> <p>15 wrong -- but it seems like at night, most</p> <p>16 people are sleeping, and you probably don't</p> <p>17 have as many officers on the road as you do</p> <p>18 during the day. Or is that incorrect?</p> <p>19 A I don't want to put myself on the limb and</p> <p>20 guess at something that's going to be</p> <p>21 incorrect.</p> <p>22 Q All right. So how long did you work Shift C</p> <p>23 central. Was that days of -- that was</p> <p>24 rotating.</p> <p>25 What years did you work there?</p>	<p>1 A I would say maybe -- it was probably the end</p> <p>2 of '92 until '93, maybe. And then, I went --</p> <p>3 Q You were in patrol?</p> <p>4 A Yes.</p> <p>5 Q Then, you went where?</p> <p>6 A Then I stayed on the same Shift C. But then,</p> <p>7 I moved to the north side.</p> <p>8 Q So you were transferred to the north side?</p> <p>9 From Shift C central, '92 to roughly '93.</p> <p>10 Then, you were transferred from Shift C to</p> <p>11 north side.</p> <p>12 A I don't consider it a transfer. You're still</p> <p>13 on the same shift.</p> <p>14 Q Okay. So same shift is not a transfer?</p> <p>15 A No.</p> <p>16 Q All right. Were you working still the</p> <p>17 rotation --</p> <p>18 A Correct.</p> <p>19 Q -- days and nights?</p> <p>20 And how long were you on that shift, or</p> <p>21 north side?</p> <p>22 A Until June 15th, 1995.</p> <p>23 And I need to make a correction. I'm</p> <p>24 just thinking about it.</p> <p>25 When you was referring to employment,</p>

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1 there was a separation. June 15th, 1995.  
2 Q Was that military related?  
3 A No.  
4 Q What was it?  
5 A Louisiana State Police.  
6 Q And how long were you separated?  
7 A Two weeks.  
8 Q Kane made it one day, I think.  
9 So just to kind of cut to the chase and  
10 move forward. Apparently, at some point  
11 in '95, you decided to make a career change,  
12 applied to the state police, were hired.  
13 Started on June 15th or thereabouts, of '95,  
14 and decided after two weeks, that that wasn't  
15 for you and you wanted to go back to the PD.  
16 Is that fair?  
17 A It wasn't a matter of it wasn't for me. It  
18 was financially, it wasn't feasible at the  
19 time.  
20 Q You made less money with the state police?  
21 A Yeah. It was less money, but the insurance,  
22 the health care package wasn't --  
23 Q Did the fact that you decide -- that you  
24 decided to leave LPD and go to the state  
25 police, did it have anything to do with your

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1 Q Okay.  
2 A I came back.  
3 Q Okay. So you were only gone two or three,  
4 four weeks, maybe?  
5 A Yes.  
6 Q All right. And did you go right back in  
7 where you were, or did you have to start the  
8 process over?  
9 A No, I went back.  
10 Q And did you lose any seniority?  
11 A No, sir.  
12 Q And who was the chief at that time?  
13 A '95? I think it was still Crenshaw.  
14 Q How did you manage to not lose any seniority?  
15 A That's a question, Mr. Corry, if I can answer  
16 that, I can win the lottery. No one never  
17 gave me --  
18 Q I'm sorry?  
19 A -- a straight answer on that.  
20 Q Do you think you got favorable treatment?  
21 A I don't know.  
22 Q Who was your chain when you left and when you  
23 came back?  
24 A I'm trying to remember. I think my sergeant  
25 was Donald Caesar. I know Major Ralph Peters

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1 employment with the LPD, such as you had  
2 problems with the supervisor, or you got in  
3 trouble, or somebody was causing you trouble,  
4 or was it just simply, I want to make a  
5 career move to the LPD?  
6 A It was only a career opportunity.  
7 Q All right. And the same thing, the same  
8 question coming back from state police back.  
9 Anything other than the financial issues you  
10 discussed with me?  
11 A Repeat that question.  
12 Q When you decided to make the change back from  
13 state police back to LPD, was it anything  
14 other than the health care package and  
15 financial issue you mentioned to me?  
16 A Are you asking, is that the only reason why I  
17 returned back?  
18 Q Yes.  
19 A Yes.  
20 Q Okay. When you returned, when did you  
21 return? Do you remember the date you started  
22 back?  
23 A I can't give you exact date. It was that  
24 same year. Maybe two weeks. I returned,  
25 maybe that following week.

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1 was still the major in patrol. I can't  
2 remember who was the lieutenant, as well as  
3 the captain.  
4 Q Did you ever -- I'm sorry.  
5 A I can't remember who was the captain or the  
6 lieutenant.  
7 Q And then, when you returned, it was the same?  
8 A No. I'm saying I can't remember if it was  
9 the same.  
10 Q But it was the same major?  
11 A Yes.  
12 Q Okay. Did you ever work directly within  
13 Chief Craft's chain before he became chief?  
14 A Yes.  
15 Q When?  
16 A June 1996.  
17 Q Until?  
18 A I can't give you exact date. I guess Chief  
19 Craft would be prone to answer that.  
20 I know he -- he was the captain in the  
21 Criminal Investigation Division at that time,  
22 and he got promoted to major and left. So I  
23 don't know. I can't give you an exact date  
24 of when he was promoted and left that  
25 section.

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1 Q Who was the chief at that time, still  
2 Crenshaw?  
3 A Yes.  
4 Q When did Crenshaw retire?  
5 A I don't know.  
6 Q After Crenshaw, it was the former FBI guy,  
7 not FBI, the U.S. Marshal guy?  
8 A Ronnie Boudreaux.  
9 Q Was he after Crenshaw?  
10 A Yes, sir.  
11 Q And then, from Boudreaux, it went to Hundley,  
12 from Hundley to Craft; is that correct?  
13 A That's correct.  
14 Q Okay. Did you have any issues when you  
15 worked under Chief Craft in CID where he was  
16 the captain?  
17 A What do you mean, "issues"?  
18 Q Did you have any personality conflicts with  
19 him?  
20 A He got upset with me one time over a lottery  
21 for Greek week where he was drafting people.  
22 And initially, it was stipulated by Chief  
23 Craft in a meeting with all the employees  
24 with the Criminal Investigation Division,  
25 that employees didn't want to work Greek

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1 Q Is that the thing that I think some  
2 fraternities, or something associated with  
3 UL --  
4 A Yes.  
5 Q -- have a big party in the park?  
6 A Yes.  
7 Q And they come from all over?  
8 A Yes.  
9 Q I think all over the country, right?  
10 A That's correct.  
11 Q Okay. Yes, they trash our parking lot every  
12 year.  
13 Okay. Let me go back to your -- and  
14 we're probably close.  
15 You came back after your separation from  
16 the state police, went back into Shift C,  
17 north side. Is that accurate?  
18 A Correct.  
19 Q Okay. And then, where did you go from there?  
20 A The Criminal Investigation Division.  
21 Q Okay. That's referred to as CID?  
22 A Correct.  
23 Q And is there a particular shift that you were  
24 on?  
25 A There's no shift.

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1 week. And they decided to draft people  
2 because they couldn't get enough volunteers.  
3 But he stipulated that the initial draft, if  
4 your name was picked, you're not getting out  
5 of it. And his exact words were, unless you  
6 get killed, or you're serious injured, where  
7 you can't move, you're going to work it.  
8 And --  
9 Q What did you call it, week week?  
10 A Greek week.  
11 Q Greek week.  
12 A And somehow, the initial draft letter came  
13 out with the list of officers that were  
14 drafted to work. And then, he had a  
15 secondary list came out, where he did a  
16 redraft, and certain officers were taken off  
17 the list, who, I guess were his cronies, that  
18 worked Dillard's. For instance, Phil  
19 Fontenot, Vaughn Burris, and people like  
20 that. And --  
21 Q Were you drafted on the list?  
22 A No.  
23 Q Okay. What year was this?  
24 A I can't give you exact year. It was in the  
25 hay day of Greek week.

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1 Q No shift for CID.  
2 Is that a position you had to apply for?  
3 A Yes.  
4 Q Is it based on merit?  
5 A Yes.  
6 Q Okay. And what was your rank at that time?  
7 A Corporal.  
8 Q When did you make corporal?  
9 A I would have to refer to my personal action  
10 form in here probably.  
11 Q Roughly, how long did it take you from the  
12 time you were hired?  
13 A Four years.  
14 Q All right. What was your chain in CID?  
15 A Sergeant Dave Morris, Lieutenant Albert  
16 Fowler, Captain James P. Craft and Major  
17 Ralph Peters.  
18 Q And when you started CID, do you remember  
19 roughly the year, or the date?  
20 A June of '96 -- I'm sorry. January of 1996.  
21 Q Okay. And I think you told me Craft became  
22 the captain in June of '96.  
23 A No.  
24 Q I didn't -- he got promoted in June of '96?  
25 A No.

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1 Q I've got 6/96 written down for something.  
2 A You've got 6/96, because I told you that's --  
3 the question was posed to me, when did you  
4 start working for Chief Craft?  
5 Q Okay. That's when he came in as the captain?  
6 A No. I mistakenly told you June of '96, but  
7 it's actually January of '96, when I actually  
8 started working for him.  
9 Q Okay. And then, when he got promoted, he's  
10 no longer your captain. How long were you in  
11 CID?  
12 A As an investigator?  
13 Q That was your first position?  
14 A Correct.  
15 Q Yes.  
16 A Roughly, nine and a half years.  
17 Q So '05, something like that?  
18 A Correct.  
19 Q And what did you do -- what do you do as a  
20 CID investigator? What did you do?  
21 A I was in the juvenile division. I  
22 investigated all crimes of property, as well  
23 as persons. Crimes committed by juveniles,  
24 as well as crimes committed against  
25 juveniles.

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1 '05 -- roughly '05 to what?  
2 A Probably the end of '06.  
3 Q And where did you go from there?  
4 A Criminal Investigation Division.  
5 Q Back to CID?  
6 A Correct.  
7 Q Why?  
8 A I was told I had to go back.  
9 Q Okay. So you were transferred back?  
10 A Yes.  
11 Q Okay. Is a transfer from CID -- I guess when  
12 you get promoted, it's not a transfer, it's a  
13 promotion, right?  
14 A If you get transferred out of that particular  
15 section, yes.  
16 Q Okay.  
17 A Unless you're so lucky that that slot that  
18 you're getting promoted to is in the same  
19 section.  
20 Q In order to get promoted, it's my  
21 understanding, you've got to have the years  
22 of service, time. And then, you've also got  
23 to take the various tests that are provided  
24 by civil service, and satisfactorily complete  
25 those tests in order to get promoted. Is

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1 Q Okay. And why did you leave that position in  
2 '05?  
3 A I was promoted to sergeant.  
4 Q Do you remember the date?  
5 A I'd have to refer to my personal action form  
6 from the civil service, when I was promoted.  
7 Q Sometime in '05, though?  
8 A Roughly, yes.  
9 Q Okay. And where were you -- what was your  
10 new position?  
11 A I was a field supervisor for the action unit.  
12 Q That's still within CID?  
13 A No, sir.  
14 Q What is that in?  
15 A That's in patrol. It falls under the  
16 umbrella of patrol support.  
17 Q What do you do as a field supervisor in the  
18 action unit?  
19 A Your duties there are similar to a field  
20 supervisor in the patrol division, with the  
21 exception that the action unit, mostly they  
22 concentrate on street level narcotics,  
23 basically street level dealers that's pretty  
24 much on the corners, stuff like that.  
25 Q And how long were you in that position, from

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1 that accurate?  
2 A No.  
3 Q How do you get promoted?  
4 A You also have to have college credits as  
5 well, to achieve the rank of sergeant and  
6 lieutenant, major. And if you desire to be a  
7 chief, you have to have the degree. But I  
8 think they -- I don't know the status of it  
9 right now. I think they had changed that  
10 requirement in the wake of Hundley becoming  
11 chief, or applying for chief.  
12 Q Okay.  
13 A So --  
14 Q So you had to have a college degree or  
15 college credits?  
16 A You have to have college credits in order to  
17 be promoted to sergeant.  
18 Q All right. And do you remember how many you  
19 had to have?  
20 A I don't want to put myself out on a limb and  
21 guess.  
22 Q Okay. All right. So you go back to CID, the  
23 end of '06, or the beginning of '07,  
24 something like that?  
25 A Correct.



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1 Q And how long did you stay there?  
2 A December 8th, 2010.  
3 Q What was your position, sergeant of CID?  
4 A Yes.  
5 Q Do you remember your chain?  
6 A It was Lieutenant Mac Gallien, Captain Randy  
7 Vincent, and Major Glen Dartez.  
8 Q Okay. Where did you go December 8th of '10?  
9 A I was transferred to the patrol division,  
10 power squad sergeant.  
11 Q Patrol division?  
12 A Power squad.  
13 Q From December 8th of '10, until when?  
14 A I would have to look at the transfer letter.  
15 Q I'm not holding you to the dates. I'm just  
16 trying to get a rough idea.  
17 A Maybe six months afterwards.  
18 Q What were your duties as a power squad  
19 sergeant?  
20 A I didn't have any duties.  
21 Q What does that mean?  
22 A It was just on paper. I was transferred in  
23 the wake of the Glen Dartez incident. So  
24 they put me there to punish me, because the  
25 power squad has, I guess you would say

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1 of the Glen Dartez, because they had believed  
2 that I was responsible for getting him  
3 terminated, or whatever you want to call it,  
4 or forcing him to resign. They put me -- to  
5 punish me, they put me working evenings. And  
6 power squad, the bulk of the call volume that  
7 they work is on the north side.  
8 That being said, I had -- December 8th  
9 was the date that I was supposed to be  
10 transferred, but I had accumulated a lot of  
11 adjusted time, almost in the month -- of  
12 about a month and a half. So they wanted me  
13 to burn out the adjusted time prior to me  
14 actually assuming that position in the power  
15 squad.  
16 My first day there, I was told that -- I  
17 was called in and said that my attire wasn't  
18 the correct attire to wear, and I needed to  
19 come in plain clothes. He sent me home. And  
20 the following morning, I was assigned to work  
21 cold cases. And they supplied me with two  
22 people to assist me, Calvin Parker and  
23 Christina Breaux.  
24 Q And maybe I misunderstood, or you  
25 misunderstood me.

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1 working hours that are pretty much  
2 non-conducive to most patrol officers.  
3 Q What is the power squad?  
4 A It's a shift that pretty much supplements the  
5 patrol shift. They work normally the peak  
6 hours in patrol, in order to alleviate some  
7 of the call volume from patrol. The hours  
8 are from 3:00 p.m. to 3:00 a.m.  
9 Q And you stayed there six months?  
10 A No, sir.  
11 Q Okay. I thought you told me you started on  
12 December 8th of 2010, and you were the  
13 sergeant in the power squad for roughly six  
14 months.  
15 A Yes, sir. On paper, I was the power squad  
16 sergeant.  
17 Q I'm sorry?  
18 A On paper, I was the power squad sergeant.  
19 Q All right. Did you get transferred out of  
20 there?  
21 A I don't know. I can't answer that. That  
22 would that question would be better suited to  
23 Chief Craft and the powers that be that made  
24 that decision. Because I was actually  
25 transferred to that, like I said, in the wake

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1 A Uh-huh (yes).  
2 Q You mentioned something about six months as  
3 the sergeant in patrol on the power squad.  
4 A Yes.  
5 Q What were you referring to?  
6 A You asked me how long I was there as a  
7 sergeant in the power squad.  
8 Q For six months?  
9 A And my response was six months.  
10 Q Okay. The adjusted time, is that time off?  
11 A Yes, sir. Time you earn working hours  
12 outside your normal working hours.  
13 Q All right. So you had accumulated roughly a  
14 month to a month and a half?  
15 A Pretty much.  
16 Q And so, you took that time off before  
17 assuming the role, or the position of  
18 sergeant in power squad? Did I understand  
19 that right?  
20 A Well, actually, there was -- when I was  
21 officially called in and advised that I was  
22 being transferred, I brought up the issue of  
23 some adjusted time that was accumulated, and  
24 how they were going to address it.  
25 And that's what they elected to do, to



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1 allow me to use up all the adjusted time  
2 prior to assuming the position of a power  
3 squad supervisor.  
4 Q So the month to the month and a half that you  
5 took off was prior to December 8th of 2010?  
6 A No, sir.  
7 Q It was after?  
8 A Yes.  
9 Q So basically on December 9th, you took off a  
10 month to a month and a half, whatever the  
11 adjusted time shows?  
12 A That's correct.  
13 Q It was continuous?  
14 A Yes.  
15 Q You were paid for it?  
16 A Yes.  
17 Q Okay. Is there any particular reason that  
18 you brought that issue up when you were put  
19 in power squad? Why all of a sudden was the  
20 adjusted time was an issue in your mind?  
21 A Because in the Criminal Investigation  
22 Division, it was common knowledge all over it  
23 was illegal according to state law, you can  
24 only -- you have to use your adjusted time  
25 within a 28-day cycle. They would just

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1 A 8:00 to 4:00, sometimes I'd work later than  
2 that.  
3 Q Okay. So how did you accumulate so much  
4 adjusted time if you were -- and I assume  
5 that's Monday through Friday, 8:00 to 4:00?  
6 A Yes.  
7 Q How did you accumulate so much adjusted time  
8 working in CID, if you were working 8:00 to  
9 4:00?  
10 A On-call status. Sometimes continuation of  
11 your normal work schedule. Even though  
12 sometimes I would -- there would be  
13 individuals or officers that had other  
14 supervisors, they would call me as opposed to  
15 their supervisor, because they relied on me  
16 to make the sound and rational decision on a  
17 sensitive matter. So they requested I work  
18 with them.  
19 Q Okay. And then, you would do that?  
20 A Of course.  
21 Q Okay. And the business about rolling over  
22 the adjusted time, you were the beneficiary  
23 of that, correct?  
24 A Me? No.  
25 Q Well, you used a month and a half, or a

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1 ignore it and let it roll over because of  
2 manpower issue. And they would let you take  
3 adjusted time -- let's say, for instance, I  
4 had, hypothetically speaking, 80 hours of  
5 adjusted time. As opposed to letting you  
6 take it all in one block, they would say,  
7 okay, Greg, you can take adjusted time  
8 Friday, and then, Monday, or whatever, until  
9 you absorb all of that 80 hours.  
10 The problem was I could never take it  
11 because of the manpower issue.  
12 Q All right. And this is all -- was all of  
13 this adjusted time accumulated in CID?  
14 A Yes, pretty much.  
15 Q Okay. And the reason that you get so much  
16 adjusted time is because you have to work  
17 such long hours in CID?  
18 A Sometimes you work over the normal extended  
19 hours. I mean, the duty hours, and you can  
20 either elect to take adjusted time or pay.  
21 Q What were your hours between June of '07, to  
22 December 8th of '10, in CID?  
23 A 8:00 to 4:00.  
24 Q And then, what did you actually work?  
25 Generally, what did you actually work?

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1 month?  
2 A I used a month and a half because it was  
3 something that I earned.  
4 Q Right.  
5 A Uh-huh (yes).  
6 Q But you were able to take advantage of the  
7 adjusted time policy?  
8 A No. They preferred giving me adjusted time  
9 as opposed to paying me.  
10 Q Okay. But when you were off, you didn't have  
11 to work for that month to month and a half  
12 and you were paid, correct?  
13 A Yes, sir. But I was paid because it's  
14 something that I earned.  
15 Q All right. How long, or how often would you  
16 be on on-call status when you were the  
17 sergeant in CID?  
18 A You're asking me to pull teeth, Mr. Corry. I  
19 can't give you an exact, like -- let's see.  
20 Maybe -- let's see. There's three sergeants  
21 in CID, adult side, one sergeant in  
22 juveniles, and as well a lieutenant. So how  
23 many supervisors? That's five. So every  
24 fifth week you would be on-call.  
25 Q And how long would your on-call status last?

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1 A You're on-call basically for one week.  
2 Q Monday through Friday?  
3 A Yes, sir. No. Monday through Monday.  
4 Q And you could be called out at any time in  
5 the day? You may get off at 4:00, and they'd  
6 call you at 10:00 or midnight, or 3:00 a.m.  
7 Was it something that you just handled by  
8 phone or computer, or was it something that  
9 you would have to actually go out to address?  
10 I guess it depended.  
11 A You cannot handle an issue by computer. You  
12 can either handle it via the phone, or  
13 actually going out in person.  
14 Q Okay. Did you have to go out more times than  
15 being able to handle it by the phone, or --  
16 (Interrupted)  
17 A I -- there's different variables in that, Mr.  
18 Corry. You may have one week where you're  
19 going to get called out for some things that  
20 normally you wouldn't. But it's basically a  
21 flip of the coin. Sometime -- you know, if  
22 somebody complains to the chief, something  
23 that's normal protocol, you wouldn't get  
24 called out, he would make you go out for it.  
25 So I can't really answer that.

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1 Q Okay. All right. So you get transferred to  
2 the power squad, you take your month, month  
3 and a half off. You come back for one day.  
4 And then, they put you working cold cases  
5 with two assistants?  
6 A Correct.  
7 Q And how long did you work the cold cases?  
8 A (No response.)  
9 Q So we're talking somewhere in the beginning  
10 of 2011, February, roughly?  
11 A Up until -- I would have to refer to the  
12 official promotion and transfer. But I would  
13 venture to say in April, somewhere around  
14 there, maybe.  
15 Would you like --  
16 Q We'll get to it.  
17 A All right.  
18 Q So sometime after April '11, roughly?  
19 A Yeah. It's in April, I would think.  
20 Q And you were promoted to what?  
21 A Lieutenant.  
22 Q Where were you assigned at that point?  
23 A Patrol support.  
24 Q And who was your chain?  
25 A Captain Dwayne Arceneaux, Major George Jackie

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1 Q It just depends.  
2 A Yeah.  
3 Q Okay. And I guess when you're on the on-call  
4 status, you would also be required to work on  
5 the weekend, perhaps?  
6 A You're on-call and you're subject to be  
7 called out, or you are subject to receive a  
8 phone call, which is related to your duties  
9 as that supervisor over the weekend. Yes.  
10 Q Okay. You didn't actually have to report to  
11 your office on the weekend, though, only if  
12 you got called out?  
13 A Only if it's something that warrants you  
14 coming out to investigate.  
15 Q Okay. When you were in CID, where was your  
16 office, on University?  
17 A The white house?  
18 Q No. The big building on -- where Chief  
19 Craft's office is.  
20 A Yes. The white house.  
21 Q What do you call it?  
22 A The white house.  
23 Q Why do you call it "the white house"?  
24 A I don't call it that. That's what white  
25 officers call it.

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1 Alfred, and Police Chief Jim Craft.  
2 Q And in patrol support, what did you -- what  
3 was your position?  
4 A Lieutenant.  
5 Q All right. And what were your duties?  
6 A Do you want the official duties?  
7 Q Yes. Well, no. I mean, we'll get to that.  
8 A That's official.  
9 Q What did you do on a daily basis?  
10 A I was actually assigned -- do you want to  
11 know what I did on a daily basis? Because  
12 there's two lieutenants in patrol support,  
13 but actually there was only one, because  
14 every time there was an issue that would  
15 arise with Bert Bejsovec's subordinates, I  
16 addressed it because he was never around.  
17 But that's here or there. Anyway --  
18 Q Let me ask you this question.  
19 A Go ahead.  
20 Q Bert Bejsovec was a lieutenant, as you were,  
21 in patrol support?  
22 A Yes.  
23 Q Okay. And the reason you have two is when  
24 one is not working, one's off, and then -- is  
25 that it?

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1 A No, sir.  
2 Q Why do you have two?  
3 A The reason you have two is because initially,  
4 there was only one patrol support lieutenant.  
5 And he was supervising roughly about 50  
6 people. Any police organization, if you look  
7 at the span control, which is considered how  
8 many subordinates that a supervisor is  
9 supposed to supervise, that didn't meet the  
10 criteria of one lieutenant supervising 50  
11 individuals.  
12 At that time, it was Lieutenant Dwayne  
13 Prejean who was the supervisor. After  
14 several meetings and him bringing that issue  
15 to the forefront, they decided to seek  
16 another additional lieutenant in that patrol  
17 support.  
18 And they went through the process, going  
19 to civil service, and as well as the council,  
20 in order to get that position and allocate  
21 the money for a second patrol support  
22 lieutenant.  
23 Q All right. Were you the person that became  
24 the second lieutenant?  
25 A No, sir.

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1 tell me.  
2 A Okay.  
3 Q And where was your office?  
4 A 900 East University.  
5 Q Okay. The same place it was when you were  
6 working in the power squad?  
7 A Yes.  
8 MR. SPRING:  
9 Can we go off the record for just a  
10 second?  
11 MR. CORRY:  
12 Yes.  
13 MR. SPRING:  
14 Can we take a little break?  
15 MR. CORRY:  
16 Why don't we take a lunch break?  
17 (SHORT BREAK TAKEN IN DEPOSITION  
18 FROM 11:49 A.M. TO 12:00 P.M.)  
19 MR. SPRING:  
20 I received an e-mail from Mr.  
21 Poiencot. His deposition is scheduled  
22 for tomorrow, which is what we had  
23 agreed last week. He's called offshore,  
24 so he said he can't be here tomorrow.  
25 And we'll advise when he can.

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1 Q There was somebody before you?  
2 A There were two patrol support lieutenants  
3 when I got promoted to lieutenant and assumed  
4 the patrol support lieutenant position.  
5 Q When, in relation to when you got promoted in  
6 April of '11, did they start with the second  
7 lieutenant in that position?  
8 A I can't tell you the exact time frame.  
9 Q Was it within the year?  
10 A No. It was a little bit longer than that  
11 probably.  
12 Q Okay. All right. So you come in. And how  
13 many people were you supervising?  
14 A On paper, I was supposed to supervise roughly  
15 23 people. I was in charge of downtown  
16 detail, the traffic section. And let's see  
17 who else? I have it in there. I can't think  
18 of the other people. But it added up to  
19 about 23 that I actually was supposed to  
20 supervise.  
21 Q It was downtown detail, traffic. Anything  
22 else?  
23 A Yeah. There's going to be another section, I  
24 just can't recall right now.  
25 Q All right. If you think of it later on, just

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1 MR. CORRY:  
2 Okay. And I would just like to  
3 make a note that we -- I think this is  
4 the second time it's been canceled, and  
5 we want to have it reset as soon as  
6 possible.  
7 MR. SPRING:  
8 He does, too.  
9 MR. CORRY:  
10 Q Okay. Greg, are you ready?  
11 A Yes, sir.  
12 Q I was asking you about being promoted to  
13 lieutenant around April of 2011. And I think  
14 you told me you went into -- or your office  
15 is located at 900 East University. You had a  
16 downtown detail, a traffic group. And you  
17 could not recall the third group that you  
18 were -- (Interrupted)  
19 A Mounted patrol.  
20 Q I'm sorry? Mounted?  
21 A Mounted patrol.  
22 Q Is that a specialty? Do you have to be  
23 certified to be in the mounted patrol?  
24 A Yes.  
25 Q Were you certified?

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1 A I just was a supervisor --  
2 Q You weren't riding?  
3 A -- I wasn't actually riding.  
4 Q Okay. So you didn't have to ride them. All  
5 right.  
6 A But I can ride a horse.  
7 Q Okay. What were your duties as a lieutenant?  
8 A Duties as a lieutenant was to actually  
9 supervise the sergeant, to assure that the --  
10 all the different units that I was assigned  
11 to as a group is being ran effective and  
12 efficiently.  
13 I also prepared payroll. But actually  
14 wasn't just with the sections that I was  
15 assigned to. I prepared payroll for the  
16 entire patrol support section, which was not  
17 actually what it was supposed to do -- be.  
18 Q What do you mean by that?  
19 A Lieutenant Bejsovec was supposed to prepare  
20 his payroll for his subordinates, and I was  
21 supposed to do likewise, for mine.  
22 I conducted shift level investigations  
23 for my guys, and I guess you can say as well  
24 his. Because the two shift level  
25 investigations that he had, I was tasked to

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1 -- what was your position when you were --  
2 (Interrupted)  
3 A I was a sergeant in the action unit.  
4 Q And Arceneaux would have been your  
5 lieutenant?  
6 A Yes.  
7 Q And is there any particular reason that he  
8 asked you to conduct a couple of shift level  
9 investigations?  
10 A One of them was a guy that worked for me, and  
11 I'm trying to remember the other officer who  
12 was in the patrol division. And he asked me  
13 to do it because he was inundated with a lot  
14 of things. And I guess the sergeants -- the  
15 other sergeants were -- I guess weren't  
16 reliable in order to do it in a proficient  
17 manner.  
18 Q You don't have any issue with having  
19 Lieutenant Arceneaux ask you to do those, do  
20 you? I mean, it's just a part of your  
21 duties?  
22 A It wasn't actually part of my duties, but if  
23 he asked me to do it, I did it.  
24 Q Okay. And what time frame was that?  
25 A That would have been 2005 -- in between 2005,

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1 do it.  
2 Q Was that the first time that -- and I don't  
3 want to cut you off, but I do want to ask you  
4 this.  
5 A Go ahead.  
6 Q Was that the first time that your duties  
7 included conducting shift level  
8 investigations?  
9 A On?  
10 Q When you became lieutenant in patrol support?  
11 A Okay. Could you clarify that a little bit as  
12 far as shift level investigations on  
13 individuals that fell under my supervision,  
14 or in addition to his?  
15 Q No. No. Prior to becoming lieutenant --  
16 A Uh-huh (yes).  
17 Q -- in patrol support, in April of 2011.  
18 Anytime before that, were you ever -- was it  
19 ever part of your duties to conduct shift  
20 level investigations?  
21 A No. But I was tasked to do a couple of them  
22 when I was a sergeant.  
23 Q Okay. By who?  
24 A Retired Captain Dwayne Arceneaux.  
25 Q All right. And where were you when you were

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1 to the end of 2006, I'd say.  
2 Q Were any of those shift level -- those two  
3 shift level investigations appealed to civil  
4 service?  
5 A I don't know.  
6 Q Don't know.  
7 A They should -- well, I take that back. One  
8 of them was unfounded. That was Tom Bercier.  
9 The other one, I don't know what was the  
10 outcome of that.  
11 Q All right. So then, when you get into  
12 lieutenant -- when you're promoted to  
13 lieutenant in patrol support, then part of  
14 your duties is to conduct shift level  
15 investigations for your men. And then,  
16 you're telling me you also had to do it a  
17 time or two for Lieutenant Bejsovec's men?  
18 A I don't know if it's actually on paper that  
19 that's part of your duties, as far as if you  
20 look up a patrol support lieutenant, if it's  
21 on there or not. From me reviewing that, I  
22 don't recall seeing it. And I may be wrong.  
23 But I know it was common knowledge  
24 throughout the police department, the chief,  
25 when he would actually authorize an



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1 investigation, because he's the only one that  
2 actually can do that, according to general  
3 orders, he would elect to pick certain  
4 lieutenants that he knew definitely would do  
5 a proficient job in conducting an  
6 investigation on an officer.  
7 I don't know if, you know, it was me.  
8 You know, retired Lieutenant Gabe Thompson,  
9 was, you know, one individual that was  
10 proficient in that field, where he was  
11 knowledgeable of policies and procedures, as  
12 well as officer's due process rights.  
13 So there were certain lieutenants that  
14 -- a pool of lieutenants that he should  
15 choose to do that, apart from Internal  
16 Affairs.  
17 Q And you were one of them?  
18 A Sometimes, yes.  
19 Q Okay. That's good police policy to have guys  
20 that can do a good investigation do them?  
21 A If they do a fair and impartial and thorough  
22 investigation, yes.  
23 Q Okay. And do you know for a fact that Gabe  
24 Thompson was one that the chief relied on, as  
25 well?

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1 something?  
2 A Yes.  
3 Q All right. And were you assigned to a  
4 particular precinct or shift when working as  
5 patrol support section lieutenant?  
6 A No. You work for the patrol support.  
7 Q Okay.  
8 A But I may add. You said in the excess of 13  
9 months, or roughly 13 months. That was my  
10 schedule, 7:30 to 3:30. It changed, so --  
11 Q When?  
12 A If my memory serves me correct, May 27th, the  
13 hours changed.  
14 Q Of what year?  
15 A 2012.  
16 Q Okay. When you were -- you were transferred  
17 to a different position.  
18 A When?  
19 Q May 22nd of 2012.  
20 A No, sir.  
21 Q You were not?  
22 A No, sir.  
23 Q You were still the lieutenant in patrol  
24 support?  
25 A The official letter came out May 22nd, of me

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1 A I think Gabe Thompson would be -- I'd say as  
2 far as be a benchmark. If you want another  
3 lieutenant to emulate what he does, it would  
4 be him.  
5 Q All right. Okay. So then, you get into  
6 patrol support, and you worked there from  
7 April of '11, to when?  
8 A April of 2011 to --  
9 Q April of 2011, until your termination?  
10 A No, sir.  
11 Q All right. Until when?  
12 A May 22nd.  
13 Q Of?  
14 A 2012.  
15 Q Okay. Where were you transferred then?  
16 A Precinct 4, night shift.  
17 Q What was your duties? I'm backing up on you.  
18 When you were in patrol support, what were  
19 your working hours?  
20 A Initially, it was 7:30 to 3:30, as I can  
21 recall.  
22 Q A to P?  
23 A Yes, sir.  
24 Q And you worked there roughly a year and a  
25 month, something like that, 13 months,

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1 being transferred. The actual transfer was  
2 going to take in effect, June 10th of 2012.  
3 Q And at that point, your duties -- excuse me,  
4 your hours of work changed?  
5 A From May 22nd to June 10th, yeah. That's  
6 correct.  
7 Q And what they were they?  
8 A They were 8:00 to 4:30.  
9 Q A to P?  
10 A Yes.  
11 Q And what was the reason for the change?  
12 A According to Captain Ron Czajkowski, after  
13 having a discussion with Major Alfred, they  
14 decided to change my working hours, and also  
15 assign me a PD cellular phone. And also,  
16 they asked me to -- when I'm not working my  
17 normal patrol support duties as a lieutenant,  
18 to make myself available to answer calls on  
19 the road. And also, prohibited me from  
20 speaking to any individuals outside the realm  
21 of patrol support duties.  
22 Q Okay. Did you ever work with -- directly  
23 within the chain of Kane Marceaux?  
24 A No, sir.  
25 Q What about Scott Poiencot?

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1 A Poiencot.  
2 Q Yes.  
3 A No, sir.  
4 Q What about Norbert Myers? I think he told me  
5 he was your lieutenant way back.  
6 A He was my field training officer. That's  
7 about it.  
8 Q Okay. What about Novey Stelly?  
9 A Yes, we worked on shift.  
10 Q When?  
11 A I'd venture to say the end of '92 to  
12 probably '94, something like that. Maybe a  
13 little bit longer than that.  
14 Q All right. What about with Mr. Hewitt?  
15 A No, sir.  
16 Q What about Mr. Gabe Thompson?  
17 A We worked on shift together when I initially  
18 was cut loose from the field training  
19 program.  
20 Q Way back when?  
21 A I would say the tail end of '91, until I  
22 was -- went to the opposite shift. We were  
23 actually on the same shift, but actually --  
24 no, we did work -- I take that back. Yeah,  
25 we worked on the north side together. That's

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1 that patrol support lieutenant that is in  
2 charge of those guys, if it was an allegation  
3 of employee misconduct against that  
4 particular officer that fell under him --  
5 under that shift lieutenant that works for  
6 him, he would normally conduct the  
7 investigation.  
8 Well, when you cut me off, I was about  
9 to say, well, that wasn't the case, because I  
10 was working Bert Bejsovec's employees, also,  
11 that he supervised.  
12 Q Why is that?  
13 A That question needs to be posed to Chief  
14 Craft. I can venture to say, they didn't  
15 want to inundate Bert Bejsovec with -- bog  
16 down anymore cases, because he was friends  
17 with Ron Czajkowski, Major Randy Vincent at  
18 the time. And every Thursday after the  
19 conclusion of Compstat, they would go off and  
20 play golf.  
21 So if he was tasked to do  
22 investigations, he wouldn't be able to do  
23 that.  
24 Q So they played golf every Thursday after  
25 Compstat meetings?

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1 true.  
2 Q All right. I think I did cut you off --  
3 A Uh-huh (yes).  
4 Q -- when I was asking you about your duties  
5 when you were the patrol support section  
6 lieutenant. And we got sidetracked on the  
7 shift level investigations. And I didn't  
8 want to cut you off.  
9 Was there anything that you wanted to  
10 add to your duties? You told me about  
11 payroll. You told me about if you needed to  
12 do a shift level investigation, you would be  
13 the one to do it, if ordered.  
14 A No, sir, not if ordered. If -- I was  
15 required to on paper, as far as your -- your  
16 duties were to supervise the people, like I  
17 said, monitored traffic and downtown detail.  
18 It was common knowledge, I don't know if  
19 it's actually on paper or not, but you also  
20 would -- if it was warranted, that the chief  
21 of police, like I said, who is the only  
22 person authorized to authorize an  
23 administrative investigation or to call for  
24 some type of investigation on an officer for  
25 alleged misconduct, that shift lieutenant, or

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1 A Pretty much. That's common knowledge.  
2 Q 52 weeks a year?  
3 A I wouldn't say 52 weeks a year. But let's  
4 see. I have the transfer letter when Ron  
5 Czajkowski was transferred to the patrol  
6 support section as a major, as well as  
7 retired Major Randy Vincent was promoted and  
8 transferred to patrol major. And maybe a  
9 month or two afterwards, after they were  
10 promoted, they would play golf.  
11 Q All right. So Czajkowski was a major at the  
12 time they started golf?  
13 A Czajkowski was a captain.  
14 Q Okay. When he became a captain, they started  
15 playing golf?  
16 A Yeah, pretty much.  
17 Q Okay. But you told me that you were  
18 supervising his men when both of y'all were  
19 lieutenants in patrol support.  
20 A Whose men?  
21 Q Lieutenant Bejsovec's.  
22 A Yes.  
23 Q Okay. And you had to do shift level  
24 investigations for his guys as well?  
25 A Yes.



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1 Q How many did you have to do for them?  
2 A I did two. Pretty much all the allegations  
3 of employee misconduct, complaint form, if  
4 you go back, my name is on it as far as  
5 interviewing the person that complained and  
6 came in.  
7 Q How many did you -- how many shift level  
8 investigations did you perform, either for  
9 your guys or Bejsovec's guys, while you were  
10 the patrol support lieutenant, total?  
11 A Four.  
12 Q Pardon?  
13 A Four.  
14 Q Two for him, and two for you?  
15 A Yes.  
16 Q Okay. And it was during that time frame from  
17 April of '11, through May of '12?  
18 A Yes.  
19 Q Do you know if any of those were appealed to  
20 civil service?  
21 A No.  
22 Q Were all of those investigations completed  
23 within the police officer's bill of rights?  
24 A Yes.  
25 Q And you know what I mean by that, the time

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1 60 days?  
2 A Yes.  
3 Q Do you have a reason why?  
4 A Yes, sir, I do. I was working the initial  
5 investigation, in which Jeremy Dupuis  
6 received a one-day suspension. I had another  
7 investigation of one of my guys. I had an  
8 evaluation to complete. Every other  
9 Thursday, I was conducting -- I mean, I was  
10 inputting payroll for in the excess of 48  
11 people, the entire patrol support section, as  
12 well as doing the annual report for the  
13 traffic section. One lieutenant. Some of  
14 the tasks that I named. Bert Bejsovec was  
15 supposed to do it.  
16 I brought that to the attention of my  
17 immediate supervisors. It fell on deaf ears.  
18 Q Who were your immediate supervisors?  
19 A Ron Czajkowski and Randy Vincent.  
20 Q And Greg, for purposes of the record, were  
21 they your captain and major from April of  
22 2011 until May 22nd of 2012?  
23 A I would -- I would guess. But to give you a  
24 definitive answer, I would have to look at  
25 the transfer letters.

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1 delays, the 60 days, unless there was an  
2 extension?  
3 A No. One of them wasn't.  
4 Q It was one that you investigated, you were in  
5 charge of it?  
6 A When I was tasked to, yes.  
7 Q Okay. Did it involve your men or Lieutenant  
8 Bejsovec's men?  
9 A Lieutenant Bejsovec.  
10 Q What was the ultimate outcome of that  
11 investigation?  
12 A I don't know. I received a letter of  
13 reprimand.  
14 Q You did?  
15 A Yes.  
16 Q Why?  
17 A For failing to complete in 60 days.  
18 Q I think you have that in your submission,  
19 too, don't you, your discovery responses?  
20 A Yes, sir.  
21 Q We'll come back to that when we get to the  
22 documents, but let me ask you about it now.  
23 Did you violate the 60 days?  
24 A (No response.)  
25 Q Did you not complete the investigation in the

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1 Q That's fine.  
2 But your recollection is that they --  
3 that was your major and captain. We'll look  
4 at the documents to make sure it didn't  
5 change, but you don't recall a change.  
6 A Well, I can tell you roughly six months when  
7 I initially was promoted and assumed the  
8 position of patrol support lieutenant, it was  
9 Captain Dwayne Arceneaux and Major Alfred.  
10 So I don't know where that separation takes  
11 place, if it's April or not.  
12 Q Did Captain Arceneaux retire?  
13 A Yes.  
14 Q And is that the reason the captain switched  
15 from Arceneaux to Czajkowski?  
16 A No.  
17 Q What was the reason for that, if you know?  
18 A Captain Arceneaux and Major Alfred decided  
19 that they wanted to become captain and major  
20 in Criminal Investigation Division.  
21 Q Okay. So they were transferred to CID, you  
22 remained in patrol support?  
23 A Correct.  
24 Q All right. So in summary, the investigation  
25 that you performed exceeded the 60 days. And

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1 it's your opinion, it's because you had a lot  
2 of duties to perform, and it just simply  
3 slipped through the cracks. Is that a fair  
4 -- (Interrupted)  
5 A No.  
6 Q Okay.  
7 A I had duties that I were performing that, in  
8 all actuality, I shouldn't have been  
9 performing them because it should have been  
10 the responsibility of the other lieutenant.  
11 But because of preferential treatment and  
12 favoritism, I was tasked to do it.  
13 Q All right. And who -- (Interrupted)  
14 A It -- can I finish?  
15 Q Yes.  
16 A It finally came to a head in February, which  
17 I should have an official e-mail, where they  
18 actually decided that they were going to  
19 separate the duties. But that was after the  
20 investigation and the letter of reprimand  
21 started.  
22 Q Okay. In February of what year?  
23 A 2012.  
24 Q Did you appeal the letter of reprimand?  
25 A No.

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1 Q And it is dated April 20th of '12, correct?  
2 A I didn't receive it April 20th, 2012.  
3 Q But the letter's dated April 20th?  
4 A I know that, but I didn't receive it April  
5 20th, 2012.  
6 Q When did you receive it?  
7 A April 17th, I was told I was getting a letter  
8 of reprimand from Major Alfred.  
9 Q When did you actually get this?  
10 A I can't remember, Mr. Corry.  
11 Q But you do recall receiving it?  
12 A I do recall it -- receiving it, and I vividly  
13 remember it was the day prior to the civil  
14 service hearing with Bert Bejsovec's payroll  
15 form.  
16 Q All right. You said that you complained to  
17 -- those are your copies?  
18 MS. COREIL:  
19 Yes.  
20 A Uh-huh (yes).  
21 MR. CORRY:  
22 Q -- that you complained to Captain Czajkowski  
23 and Major Randy Vincent about having to do  
24 your duties as well as Lieutenant Bejsovec's.  
25 A Yes.

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1 Q What was the -- what was the date of the  
2 letter of reprimand, roughly? And I know  
3 it's in the book, and we're going to get to  
4 all of the documents.  
5 I guess it was before February of '12?  
6 A No, sir.  
7 Q It was after?  
8 A Yes, sir. It was the day prior to the civil  
9 service hearing with the issue of Bert  
10 Bejsovec's complaint that I filed.  
11 Conveniently, the day before.  
12 Q Do you remember the date of that letter of  
13 reprimand?  
14 A Yes. If I can refer to my documents.  
15 Q Okay. If you want to look in these, because  
16 we have them --  
17 A All right.  
18 MS. COREIL:  
19 Look at GC-280.  
20 MR. CORRY:  
21 Q That's it.  
22 A (Witness examines documents.)  
23 Q Is that it, Greg, GC-280 and 281, that's the  
24 letter of reprimand?  
25 A That's correct.

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1 Q Okay. Did you have to do all of his duties,  
2 or just some of them?  
3 A Let's see. Duties he's supposed to do.  
4 Payroll, I did payroll. Shift level  
5 investigations, I did shift level  
6 investigations.  
7 Let's see, what else? Fielding  
8 questions from his subordinates, I did it.  
9 Let's see. What else? I think that's  
10 about it.  
11 Q Okay. Is it safe to say that you didn't have  
12 to do all of his duties, just the areas that  
13 you've described?  
14 A Those that I listed is the major duties.  
15 Q Okay.  
16 A Yeah. That takes up the bulk of his time.  
17 Q What was he doing?  
18 A I don't know. Playing golf, or something. I  
19 can't answer that.  
20 Q Did you -- (Interrupted)  
21 A But I know definitely he played golf every  
22 Thursday, or every Friday.  
23 Q Did you -- when y'all worked, did he also  
24 worked at 900 East University?  
25 A The white house, yes, sir.

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1 Q Did you -- (Interrupted)  
2 A Uh-huh (yes).  
3 Q Were your offices in close proximity to each  
4 other?  
5 A Yes, sir.  
6 Q Describe it for me. Where were y'all's  
7 offices, what floor?  
8 A Third floor.  
9 Q Okay.  
10 A The -- in relationship to the overlay of the  
11 building, it would be the -- I guess you can  
12 call it the southwestern corner.  
13 Q Were y'all next door to each other?  
14 A No, sir.  
15 Q Did y'all work the same shift?  
16 A I can't tell you his hours. He -- he came in  
17 when he wanted. According to Major Alfred,  
18 and when -- from the inception of adding the  
19 second patrol support lieutenant, he was  
20 supposed to work the evening shift because  
21 the people he supervises worked the evening  
22 shift.  
23 Q And what shift would that have been? What  
24 are the times of the evening shift?  
25 A I don't know, it varies. K-9 come in in the

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1 It was common knowledge, everybody at  
2 that police department thought I was the only  
3 patrol support lieutenant there. They  
4 wouldn't even call him.  
5 Q All right. How often did you have to do his  
6 payroll?  
7 A Every other Thursday.  
8 Q Did you ever discuss it with him?  
9 A I discussed it with him, as well as Captain  
10 Czajkowski, as well as Major Randy Vincent.  
11 Q And how many times did you discuss it with  
12 Bejsovec first?  
13 A Twice.  
14 Q And what time frame was that?  
15 A That was around the tail end of November of  
16 2011.  
17 Q And what did he say?  
18 A He said that that's above his pay grade. His  
19 exact words.  
20 Q What did you complain to him?  
21 A It wasn't a complaint. I was just bringing  
22 up that, according to the patrol support  
23 lieutenant duties, they're supposed to be  
24 shared equally and there's supposed to be an  
25 equitable process. You have these amount of

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1 evening. I don't know if it's 4:00 p.m., to  
2 whatever time they get off. ATAC come in  
3 between 4:00 and 5:00. And CSU, they  
4 normally work in the evening, sometimes 12  
5 noon, but the bulk of the time is in the  
6 afternoon, 3:00, 4:00 or 5:00.  
7 Q And what I'm trying to do -- what I'm getting  
8 at is, were y'all -- did y'all's working  
9 hours mandate that you were both in the  
10 building at the same time, or did they --  
11 were they separate hours, or did they  
12 overlap?  
13 I'm just trying to figure out if -- I  
14 understand what you're saying, that you were  
15 having to do some of his duties. I'm just  
16 wondering if you didn't see him there was  
17 because y'all worked different hours. That's  
18 what I'm trying to find out.  
19 A No, sir. When I was doing his duties, as far  
20 as fielding complaints from people that were  
21 there to file an allegation of employee  
22 misconduct, Lieutenant Bejsovec was there on  
23 that date and he was there at the time that  
24 these people were fielding -- coming in and  
25 complain.

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1 people that you're supposed to be doing  
2 duties for, and I have these amount of  
3 people.  
4 Q Okay. What did he say?  
5 A I just told you what he said, that's above  
6 his pay grade. He cannot address it.  
7 Q All right. Did you tell him you were doing  
8 the payroll for his guys?  
9 A I didn't have to tell him that, Mr. Corry, he  
10 knew that already.  
11 Q All right. Greg, I don't work there and I  
12 never have worked there, so I'm just trying  
13 to find out what went on. It may -- some of  
14 my questions may seem silly, but I don't  
15 know. And this is my opportunity to question  
16 you to find out --  
17 A Okay.  
18 Q -- what went on there, and the nature of your  
19 complaints, and how it relates to this  
20 lawsuit.  
21 So I'm trying to figure out, you went to  
22 him, said, hey, man, we're supposed to be  
23 sharing this equally, and that's what his  
24 response was, above my pay grade?  
25 A That pretty much sums it up.

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1 Q All right. Did you say, specifically, hey,  
2 I'm doing the payroll for your guys, why  
3 don't you start doing it?  
4 A Yes.  
5 Q And what did he say?  
6 A It's above my pay grade.  
7 Q All right. So you complained to him on two  
8 occasions, roughly in November of 2011. You  
9 complained to him first?  
10 A Yes. November, and then, the beginning of  
11 December.  
12 Q Okay. And then, you went to who after that,  
13 when you got -- (Interrupted)  
14 A I didn't go to anybody, in particular. I  
15 called Captain Czajkowski, and told him that  
16 I needed to discuss a matter with him. And  
17 He came to my office. And I brought this to  
18 light, about this patrol support lieutenant  
19 position is not a fair and equitable process  
20 right now. There's two lieutenants in that  
21 position and they should be doing equal  
22 amount of work.  
23 And he summoned Lieutenant Bejsovec to  
24 my office, and we discussed it further. And  
25 he said he would get back with me.

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1 A The major didn't say too much. The bulk --  
2 Q That was Randy Vincent?  
3 A Yes. The bulk of the dialogue was between  
4 myself, Lieutenant Bejsovec and Captain  
5 Czajkowski. And to sum it all up, they  
6 basically said that he had additional duties,  
7 one of them was scheduling the downtown  
8 detail.  
9 Q All right. How many officers does that  
10 involve?  
11 A That's off duty. That's not part of his  
12 duties.  
13 Q Okay. How many officers does that involve?  
14 A I can't give you an exact number.  
15 Q Well, you've worked the downtown -- or  
16 supervised the downtown detail, didn't you?  
17 A No, sir. That's extra detail when you work  
18 on the weekend. That's -- afterwards was the  
19 spring board of this complaint being filed on  
20 him.  
21 Q Right. But you said you supervised a  
22 downtown detail.  
23 A That's a separate --  
24 Q That's what I'm trying to figure out, what  
25 the difference is.

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1 Q All right. And when was that?  
2 A The early part of December.  
3 Q I'm sorry?  
4 A The early part of December.  
5 Q And you went to him one time --  
6 A No, sir.  
7 Q -- the captain?  
8 How many times?  
9 A Maybe two, three times. Now, the -- the  
10 additional times, Major Vincent was there.  
11 Q Okay. And what was -- the first time, it was  
12 just the captain, he brings in the  
13 lieutenant?  
14 A Uh-huh (yes).  
15 Q The next time or two, the major was there, as  
16 well?  
17 A Yes.  
18 Q Was the lieutenant there, also?  
19 A Bejsovec?  
20 Q Yes.  
21 A Yes.  
22 Q And what, the same complaints, did you have  
23 any different complaints?  
24 A No, it was pretty much the same complaints.  
25 Q And what did the major tell you, if anything?

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1 A And I'm about to elaborate so you can get a  
2 picture.  
3 Q All right. Go ahead.  
4 A All right. The downtown detail that I  
5 supervised worked strictly downtown,  
6 predominantly the area of Jefferson, I'd say  
7 the 100 block of Jefferson, all the way up to  
8 600 or 700 block of Jefferson.  
9 Q Where all the bars are?  
10 A Pretty much, and businesses.  
11 Q All right.  
12 A And that's during the day.  
13 Q That was what?  
14 A That's during the day.  
15 Q All right.  
16 A And they're not there to concentrate on the  
17 bars, they're there to show a presence to  
18 businesses and vendors there pretty much.  
19 Because there were always complaints about  
20 transients --  
21 Q Okay.  
22 A -- loitering downtown.  
23 Q All right. And what's the detail you're  
24 referring to that --  
25 A The downtown detail is the evening detail



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1 that they work Thursday, Friday, and Saturday  
2 evenings. And they particularly concentrate  
3 on the area where the clubs are at.  
4 Q Okay.  
5 A And that is over --  
6 Q That is extra duty work?  
7 A Overtime pay.  
8 Q All right. Are there any officers down there  
9 that were part of your detail, that were not  
10 part of the overtime detail during those  
11 hours at night, Thursday, Friday and  
12 Saturday?  
13 A No, sir.  
14 Q What else did the captain and/or the major  
15 tell you?  
16 A The major didn't say anything pretty much.  
17 The captain said, well, he assumed basically  
18 that when he took over the position of  
19 captain in patrol support, that I was going  
20 to be the administrative lieutenant, and  
21 Lieutenant Bejsovec was going to be the  
22 operational lieutenant.  
23 Q Is that kind of how it's divided up  
24 throughout the police department --  
25 A No, sir.

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1 attorney. But I'm not going to ask specifics  
2 about particular --  
3 MR. SPRING:  
4 Why don't you just refer to him by  
5 initial? How's that? That way his  
6 name's not in there.  
7 MR. CORRY:  
8 Q We were talking about the administration in  
9 operations, and the discussions with the  
10 captain, the lieutenant, and the major.  
11 Any other discussions or complaints by  
12 you to them on having to do what you  
13 perceived as extra duties?  
14 A I just alluded to the investigations that  
15 Bert Bejsovec was supposed to be conducting  
16 on his people.  
17 And I don't mean to banter with you, Mr.  
18 Corry, but the person that I just mentioned,  
19 there were some hearings where it was a  
20 matter of public record, people could have  
21 attended the forum. But --  
22 MR. SPRING:  
23 Just refer to him by JD.  
24 A But I'll refer to him as JD.  
25 MR. CORRY:

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1 Q -- you have one that's administrative, and  
2 one that's operational?  
3 A No, sir.  
4 Q It's not?  
5 A Not in patrol support.  
6 Q Is it now?  
7 A I don't know how it is now. I'm not there  
8 any more.  
9 Q All right. Any other complaints? Or scratch  
10 that.  
11 Any other discussions with either the  
12 captain, or the major, or the lieutenant,  
13 about your complaints?  
14 A At that meeting, I brought up the Jeremy  
15 Dupuis.  
16 Q Okay. And I don't want to -- I've  
17 intentionally not brought up any individuals  
18 names because I don't want to get into  
19 private personnel matters. We've had those  
20 issues with the state courts.  
21 A Private personnel matters?  
22 Q Yes. Things that weren't appealed to civil  
23 service are private personnel, so I don't  
24 want to get into those names here. If you  
25 choose to do so, that's between you and your

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1 Q Okay. So anything else on the payroll,  
2 having to prepare the payroll, discussions  
3 with those three?  
4 A You're talking about that particular meeting  
5 or --  
6 Q Any meeting?  
7 A -- meetings thereafter?  
8 Q Any meetings thereafter.  
9 A That's all I can recall.  
10 Q How long does it take you to prepare a  
11 payroll every other Thursday?  
12 A I can't give you a time frame. There's  
13 different variables in that, Mr. Corry. It  
14 depends on when the sergeant finishes payroll  
15 for his guys.  
16 Q All right. The sergeant prepares the  
17 payroll, gives it to you, you verify it, and  
18 send it up the chain?  
19 A No. I input it in the computer system.  
20 Q Okay. He's got it all prepared. You take  
21 that information he gives you, verify it, and  
22 then put it into the computer?  
23 A No, sir.  
24 Q Okay. Tell me how you do payroll.  
25 A Well, when all the sergeants, including

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1 Lieutenant Bejsovec's sergeants, prepare the  
2 payroll, he gives it to me. And then, I  
3 input it into the system. And I have his  
4 signature stamp, and I stamp it.  
5 Q Okay. And who do you send that to?  
6 A I send it at the time, to Charita --  
7 Q Where is she?  
8 A -- Benoit.  
9 Q Where is she?  
10 A I guess she's the comptroller for the police  
11 department. She's downstairs.  
12 Q Okay. And then, do you know how it gets from  
13 there to human resources, or is that outside  
14 of your -- (Interrupted)  
15 A No, sir.  
16 Q You're not involved in that?  
17 A No.  
18 Q And you were inputting roughly 50 people?  
19 A Pretty much.  
20 Q That included you and Lieutenant Bejsovec?  
21 A Yes.  
22 Q And that was the entire time that you worked  
23 in patrol support?  
24 A Up until March 2012.  
25 Q Why did you stop doing payroll in March of

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1 Q Okay. And the one that the 60 days was  
2 violated, was that one of your guys or one of  
3 Lieutenant Bejsovec's guys?  
4 A His.  
5 Q His. Okay.  
6 How long does it take you to do a shift  
7 level investigation? I guess it depends on  
8 what -- (Interrupted)  
9 A Exactly.  
10 Q You might have one witness, you might have  
11 ten?  
12 A No. The one particular investigation in  
13 which -- JD, I had a total of 15 witnesses.  
14 Q Okay. Was that one of yours, or one of his?  
15 A JD is Lieutenant Bejsovec's.  
16 Q All right. Now, fielding questions --  
17 anything else on the shift level  
18 investigations, other than you had to do two  
19 of his and two of yours? Anything else?  
20 A What do you mean?  
21 Q Did you have to do any more for anybody else,  
22 or was it just those four?  
23 A It was just those four.  
24 Q All right. Fielding questions from  
25 subordinates. How often would you have to

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1 2012?  
2 A For some reason, they decided that my  
3 complaints had some merit to it.  
4 Q What were your complaints?  
5 A The same complaints I alluded to before.  
6 Q Okay. That you were doing what you perceived  
7 to be more duties than you were --  
8 (Interrupted)  
9 A No, it wasn't a perception. It was a fact.  
10 Q Okay. That's your opinion.  
11 A No, sir.  
12 Q But you were doing -- (Interrupted)  
13 A No, sir.  
14 Q But you were doing -- (Interrupted)  
15 A All right.  
16 Q You were doing more duties than you thought  
17 you should have been. And in March of 2012,  
18 you stopped doing payroll altogether, or just  
19 for Lieutenant Bejsovec's people?  
20 A Just for Lieutenant Bejsovec.  
21 Q All right. And then, you were cast with  
22 having to conduct two shift level  
23 investigations for yourself, for your guys,  
24 and two for Lieutenant Bejsovec?  
25 A Yes.

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1 field questions from your subordinates?  
2 A I can't answer that, Mr. Corry.  
3 Q Give me -- (Interrupted)  
4 A It may be a particular day, I may have a  
5 conversation with one of my sergeants, five,  
6 six times a day. If it's a particular  
7 project he's working on, and he needs  
8 guidance or direction, as far as how he  
9 should pursue it. He may sit down with me  
10 and we may discuss it a couple of hours.  
11 Q Okay.  
12 A And then, it may be a day that I don't have  
13 contact with him at all.  
14 Q How many sergeants did you have under you?  
15 A Two.  
16 Q What were their names?  
17 A Austin Provost and Ricky Rees.  
18 Q All right. And were those the same --  
19 (Interrupted)  
20 A And -- let me finish.  
21 Initially, I had two. At the tail end,  
22 I had three. And I had Dwayne Stutes.  
23 Q He was the third?  
24 A Yes.  
25 Q And did Lieutenant Bejsovec have the same



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1 three?  
2 A Yes, he should have three.  
3 Q Those same individuals?  
4 A No, sir. He had three sergeants as well.  
5 Q Who were they?  
6 A I don't know who all of them are. I know,  
7 because they changed a little bit. There was  
8 a sergeant in K-9, there was a sergeant in --  
9 two sergeants in CSU.  
10 Q What is CSU?  
11 A Crime Suppression Unit.  
12 And when they decided to share the  
13 responsibilities equally, he would have had  
14 four. So I took Dwayne Stutes.  
15 Q Okay. So when you said you did the downtown  
16 detail, the mounted patrol, and the -- what  
17 was the third one?  
18 A Traffic unit.  
19 Q -- traffic unit, what do you describe those,  
20 units?  
21 A Units, sections.  
22 Q Okay. And how many did he have? He had the  
23 downtown detail --  
24 A Who?  
25 Q Lieutenant Bejsovec.

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1 fielding questions?  
2 A Besides my chain of command?  
3 Q Correct.  
4 A No.  
5 Q And the only -- not the only, but you made  
6 two to three to the captain, and the major  
7 total. Is that accurate?  
8 A (No response.)  
9 Q One initially to the captain, and then a  
10 couple more, one or two more.  
11 A No, I wouldn't say accurate. I would say I  
12 would guess it's somewhere in that ballpark.  
13 Q Okay. All right. You mentioned something  
14 earlier about this Glen Dartez incident, that  
15 somebody blamed you for it. What do you  
16 describe, what are you talking about?  
17 A Somebody?  
18 Q Tell me what that means. What was the Glen  
19 Dartez incident?  
20 A Major Glen Dartez was in -- was the criminal  
21 investigation commander. There was an  
22 incident where I was on-call as a criminal  
23 investigation supervisor that week. I  
24 received the initial phone call. I can't  
25 remember who was the supervisor in patrol.

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1 -- the crime suppression. What other  
2 unit did he have?  
3 A No, sir. He didn't have the downtown detail.  
4 Q Okay.  
5 A That was the explanation they gave me as far  
6 as additional responsibilities.  
7 Q Well, he had the crime suppression, he had  
8 the K-9. What other unit did he have?  
9 A And he had ATAC for some time before it came  
10 over to me.  
11 Q All right. How often did you have to take  
12 questions from his subordinates?  
13 A Every week. Payroll issues. Sometime it was  
14 one of his sergeants with CSU would be at his  
15 wit's end on a call dealing with a criminal  
16 matter. They would call me, as opposed to  
17 him.  
18 Something dealing with addressing a  
19 subordinate, they would call me to seek  
20 guidance, as far as how they should address  
21 that issue with them without violating any  
22 policies or procedures. They would call me.  
23 Q Any other complaints that you made to anybody  
24 about those duties, issues, regarding  
25 payroll, shift level investigations and

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1 But there was an incident at 202 Wilcox,  
2 in which there was an argument, a verbal  
3 argument that occurred. It escalated into it  
4 becoming physical. And it was between a  
5 female and a male.  
6 The female sustained some unknown  
7 injuries to her facial area, and she was  
8 transported to Lafayette General.  
9 And at the time, the initial  
10 conversation with the supervisor in patrol,  
11 we didn't know the status of her injuries at  
12 the time.  
13 Q Who contacted you?  
14 A I don't remember the supervisor.  
15 Q But it was someone below you, or someone  
16 above you in the chain?  
17 A I don't remember if it was a sergeant or a  
18 lieutenant. Sometimes sergeants who's out  
19 there in the field working the case, who's  
20 the best person to actually communicate with  
21 because he had firsthand knowledge and he's  
22 there. But sometimes the watch commander,  
23 who is a lieutenant, will call the on-call  
24 supervisor and communicate with him on an  
25 incident that they think requires criminal --

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1 the Criminal Investigation Division to  
2 further investigate it.  
3 Q All right. At this point, though, you're not  
4 in the CID, are you, you're in patrol  
5 support?  
6 A I'm in CID.  
7 Q Okay. A sergeant in CID?  
8 A Yes, sir.  
9 Q Do you know what time frame this was?  
10 A If I can refer to the binder, I can tell you  
11 exactly.  
12 Q Okay. We're going to get to that.  
13 A Okay.  
14 Q I think it's just quicker to kind of go  
15 through it, and then I'm going to take you  
16 through every document so we can flip and  
17 you'll be able to tell me specifically.  
18 A All right.  
19 Q Roughly, when was it? Sometime in 2010?  
20 A Yes. I'd venture to say around June.  
21 Q All right. And you don't recall who it was,  
22 whether it was a subordinate, or whether it  
23 was a superior officer, but somebody  
24 contacted you?  
25 A It would have been either an officer of equal

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1 them direction --  
2 Q So it was all on the phone?  
3 A -- as far as what they needed to do.  
4 Q Where were you?  
5 A I was at home.  
6 Q Okay. So you were on-call?  
7 A Yes.  
8 Q And that's the reason you took the call?  
9 A Yes.  
10 Q All right. And what -- what happened from  
11 there?  
12 A David Leblanc and myself proceeded to the  
13 scene. Malcolm Bussey, if I'm not mistaken,  
14 I directed him to the hospital to give me a  
15 status update on the victim's condition. And  
16 I think Jeff Hebert proceeded to the  
17 department in case we needed to type up any  
18 type of warrant, he was there.  
19 Q All right. And then, what? Completed your  
20 investigation?  
21 A No. We did a preliminary investigation. We  
22 identified the suspect, interviewed him. He  
23 provided a statement. At a time, we did get  
24 a status update, as far as the victim's  
25 condition. And she was in a vegetable state.

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1 rank, or someone with the rank above me,  
2 which would have been a lieutenant.  
3 Q And you don't recall, or do you recall how  
4 you were contacted?  
5 A By phone.  
6 Q Okay. And they relayed to you the  
7 information you just relayed to me.  
8 What did you do at that point?  
9 A At that point, I summoned the person's  
10 investigator, who was David Leblanc, as well  
11 as Malcolm Bussey, who was also an  
12 investigator at the time. And if my memory  
13 serves me correct, it should have been Jeff  
14 Hebert as well.  
15 And the last two, Bussey and Hebert,  
16 were persons -- I mean, property  
17 investigators.  
18 But normally, a case of that nature,  
19 you're going to call everyone out to make  
20 sure that responsibilities are disseminated  
21 equally and to make sure that it's done in a  
22 proper manner.  
23 Q Do you remember if these guys are at 900 East  
24 University?  
25 A No, sir. I called them on the phone and gave

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1 And they were waiting for notification to a  
2 family member in order for them to sign an  
3 authorization signature in order to, in  
4 laymen's term, pull the plug on the person.  
5 At that time, I directed David Leblanc  
6 that when that would occur, and they would  
7 pull the plug and she would expire, that we  
8 needed to upgrade the charges, and to go back  
9 and get a secondary interview with the  
10 suspect.  
11 The suspect provided a statement  
12 initially at the time that we went out at the  
13 scene. And he basically said, they got in an  
14 argument, he inadvertently elbowed her. She  
15 had some medical issues prior to that, as far  
16 as she would catch seizures. And he said,  
17 when he elbowed her, she became in an  
18 incoherent state. He ran outside because  
19 they were utilizing the same phone lines  
20 as -- they stayed in the apartment in the  
21 back. The main house in the front, they  
22 shared the same phone lines. When he tried  
23 to call 911, someone in the front was on the  
24 phone.  
25 So he ran outside to go to alert them

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1 that you need to get off the phone, there's  
2 an emergency.  
3 But during the course of him doing that,  
4 he noticed a white vehicle, who he described  
5 as an Avalanche, but he said it's a law  
6 enforcement vehicle because there's a black  
7 light on the side mirror.  
8 Q A black what?  
9 A A black spotlight.  
10 Q Okay.  
11 A He approached the person that was driving it,  
12 at the time he was talking to a female named  
13 Debbie, who, which the argument started over  
14 her. And he asked him for assistance. Said,  
15 hey, my girl is in the back, she needs some  
16 assistance. Can you get on your radio, call?  
17 He casually looked at him, told him, I'm off  
18 duty, rolled his window up and left.  
19 Q Okay. He told you this, or told your  
20 investigators this?  
21 A You're talking about the suspect?  
22 Q Yes.  
23 A He told me the investigator this. I was  
24 monitoring it in my office, the interview.  
25 Q So the interview was happening at the police

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1 on-call. David Leblanc's immediate  
2 supervisor was Lance Leblanc.  
3 Q And Lance Leblanc was a sergeant?  
4 A Sergeant.  
5 Q All right. Did you have anything else to do  
6 with it?  
7 A Yes.  
8 Q What was it?  
9 A At the time, he said he couldn't do it. I  
10 said, well, come on, I'll go with you.  
11 We proceeded to Lance Leblanc's office.  
12 I closed the door and I told him, David  
13 Leblanc has something to tell you. He  
14 couldn't verbalize what occurred, so I  
15 assisted him and told him exactly what  
16 happened.  
17 Q What was the problem?  
18 A I guess he was so nervous and he was caught  
19 up, because it was a major, high ranking  
20 individual that had basically committed  
21 malfeasance in office, although they said it  
22 wasn't. But he didn't respond as a first  
23 responder, put it that way.  
24 And he knew by reporting Major Dartez --  
25 Q Greg, and --

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1 station?  
2 A That's correct.  
3 Q At 900 -- (Interrupted)  
4 A East University.  
5 Q Okay.  
6 A Yes, sir.  
7 We actually charged him with, if I'm not  
8 mistaken, I think it was homicide at the  
9 time.  
10 When David Leblanc went back and  
11 conducted the secondary interview after they  
12 pulled her off of life support, we upgraded  
13 the charges to second degree murder.  
14 The following morning, I report to work  
15 as usual, went in to get a cup of coffee, get  
16 on the computer and review all my cases that  
17 have warrants to assign to investigators.  
18 David Leblanc comes in and tells me that  
19 the person that the suspect was referring to  
20 is Major Glen Dartez.  
21 At the time, he doesn't know what to do.  
22 So I instructed him that you need to report  
23 it to your supervisor, who was Lance Leblanc.  
24 Q You were not his supervisor?  
25 A I was his supervisor for that weekend

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1 A What?  
2 Q -- I don't want you to speculate on what --  
3 (Interrupted)  
4 A I'm not speculating. That came exactly from  
5 his mouth.  
6 Q Okay. And that's from David?  
7 A David Leblanc.  
8 Q Okay.  
9 A He knew by reporting Major Dartez that there  
10 would be some reprisals. Because prior to  
11 that, there was an incident that occurred at  
12 Acadiana High involving a school teacher, and  
13 which you're familiar with it, Mr. Corry,  
14 because you defended the city on it, in which  
15 Sergeant Greg Randall was suspended for five  
16 days for not properly investigating an  
17 incident. Do you recall that?  
18 Q Yes.  
19 A Okay. So prior to the investigation actually  
20 being launched on Greg Randall, Major Dartez  
21 had conducted a criminal investigation -- a  
22 meeting in CID, in which he got in a verbal  
23 exchange with Greg Randall, in which he  
24 yelled at --  
25 Q Were you present?

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1 A Yes, sir, I was present.  
2 Q Okay.  
3 A He yelled at Greg Randall, and that caused  
4 Greg to file a complaint on him. He filed a  
5 complaint on him the Friday.  
6 The Monday, an investigation started on  
7 Greg Randall.  
8 Major Randy Vincent, who was also  
9 present, who was listed as a witness in Greg  
10 Randall's complaint, was tasked to  
11 investigate the complaint that Major Dartez  
12 filed on Greg Randall for failing to properly  
13 investigate an investigation.  
14 Now --  
15 Q All right. Let's get back to the Dartez.  
16 A I'm getting to it.  
17 Q Okay.  
18 A Well, with that in mind, he knew it was  
19 already established that if you report  
20 somebody with higher ranking, somewhere down  
21 the line, they're going to return the favor  
22 in some form or fashion. So he was leery  
23 about reporting it.  
24 Q When you say "he", David Leblanc?  
25 A That's correct.

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1 that.  
2 Did you do -- did you undertake any  
3 further actions on reporting the information  
4 about Major Dartez to anybody else --  
5 A No, sir.  
6 Q -- after that point?  
7 A Because I thought, at that point, by  
8 reporting it to a supervisor at the same  
9 level as I, who is obligated and should be  
10 aware of policies and procedures that are in  
11 -- at least that compels him to report  
12 misconduct, that it wasn't warrant for me to  
13 follow up on it.  
14 Q Okay. And I just want to make sure it's  
15 clear, because you started your answer --  
16 A Go ahead.  
17 Q -- before I responded.  
18 A Uh-huh (yes).  
19 Q Did you undertake any further actions after  
20 that meeting with Sergeant Leblanc, regarding  
21 an incident with Major Dartez in reporting  
22 his presence to anybody?  
23 A I didn't take any action, as far as me  
24 initiating -- self-initiating something where  
25 I went there and tried to get the outcome of

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1 Q Okay. Just so it's clear for the record.  
2 A So I instructed him that you're obligated to  
3 report any misconduct immediately, as per  
4 general order.  
5 Q All right. So y'all go meet with --  
6 (Interrupted)  
7 A We meet with Lance Leblanc. I tell him what  
8 occurred. He looked up at the ceiling,  
9 ceiling tex. And I said, the answer's not  
10 there. You have only one choice. You can  
11 either report it to a lieutenant, who's both  
12 of our immediate supervisors, because we're  
13 sergeants at that time, who is Lieutenant Mac  
14 Gallien. He elected not to report it to Mac  
15 Gallien because he said that -- I can't  
16 remember what he said, sometimes Mac has  
17 erratic behaviors, so he didn't want to  
18 report it to him.  
19 I said, well, you're going to have to  
20 report it to Randy Vincent, who was the  
21 captain at the time.  
22 I turned to David Leblanc and Lance  
23 Leblanc and said, you know what, I'm done, I  
24 did my part. And I walked off.  
25 Q Did you have any further follow-up -- scratch

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1 what occurred.  
2 They came to me, closed the door the  
3 following morning, and told me they reported  
4 it to lieutenant -- well, actually, Major  
5 Vincent. The only problem is, as they were  
6 walking in to report it to Major -- I mean,  
7 Captain Vincent at the time --  
8 Q Which Vincent?  
9 A Randy Vincent. When they were getting ready  
10 to report it to him, Lieutenant Gallien  
11 walked in, and Captain Vincent invited him  
12 in. So it was kind of unintended, but  
13 Lieutenant Gallien was present at the time.  
14 Q All right. Let me back up.  
15 It was Captain Ted Vincent, or Randy?  
16 A Randy.  
17 Q Okay. And we're kind of all over the place  
18 and I want to make sure that we're specific.  
19 Leblanc comes to you. You tell Leblanc,  
20 we need to go to your direct supervisor.  
21 A I don't mean to cut you off. There's two  
22 Leblanc's, so --  
23 Q Right.  
24 David Leblanc comes to you --  
25 Investigator David Leblanc comes to you the



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1 next morning after this incident, or within a  
2 few days of the incident. Do you know the  
3 time frame?  
4 A Not exactly. I would venture to say it's  
5 probably a day, because we were called out  
6 early Sunday morning, somewhere around there.  
7 That Sunday evening is when he received a  
8 call that they had pulled her off life  
9 support, so --  
10 Q Within a few days?  
11 A It's within a day or so.  
12 Q All right. So Investigator David Leblanc  
13 comes to you to report this incident. Since  
14 you were the on-call supervisor, you said,  
15 look, we need to go -- or you need to go to  
16 your direct supervisor, Lance Leblanc.  
17 Correct?  
18 A No.  
19 Q Okay.  
20 A He didn't report it to me because I was on  
21 the on-call supervisor. He reported it to me  
22 because he was aware, and I was aware of what  
23 had occurred.  
24 Q Okay. All right.  
25 A And he felt comfortable reporting it to me,

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1 Q All right. So then you and -- at that point,  
2 you were done, correct?  
3 A Yes.  
4 Q All right. And do you know if Sergeant Lance  
5 Leblanc and/or Investigator David Leblanc  
6 went directly to Lieutenant Mac Gallien?  
7 A Yes.  
8 Q They did?  
9 A They didn't.  
10 Q They did?  
11 A Didn't.  
12 Q Did not. That's accurate?  
13 A Yes.  
14 Q Okay. I'm hard of hearing, so that's why  
15 I'm --  
16 A Okay.  
17 Q They did not.  
18 But at some point, they go to Captain  
19 Randy Vincent?  
20 A Yes.  
21 Q And you were not present for that?  
22 A No, sir.  
23 Q Don't know -- you weren't a firsthand -- you  
24 have no firsthand knowledge of what was  
25 reported by Sergeant Lance Leblanc and

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1 as opposed to going initially to his  
2 supervisor.  
3 Q All right. So you say, hey, we need to go --  
4 or you need to go directly to your immediate  
5 supervisor?  
6 A Correct.  
7 Q So y'all -- you and Investigator David  
8 Leblanc go to Sergeant Lance Leblanc?  
9 A Correct.  
10 Q Was there anybody else present other than the  
11 three of you?  
12 A No, sir.  
13 Q All right. Sergeant Lance Leblanc says, this  
14 needs to go to my supervisor, the lieutenant,  
15 who is Mac Gallien?  
16 A Incorrect.  
17 Q What did he say?  
18 A He didn't say anything. He looked up at the  
19 ceiling. I told him, it needs to go.  
20 Q All right. You told Investigator David  
21 Leblanc -- (Interrupted)  
22 A No, sir.  
23 Q You told Sergeant Lance Leblanc it needs to  
24 go to the lieutenant?  
25 A Yes, sir.

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1 Investigator David Leblanc to Captain Randy  
2 Vincent?  
3 A Yes, I do.  
4 Q How so, if you weren't there?  
5 A They told me what exactly they said.  
6 Q Okay. But you weren't there?  
7 A You're talking about that particular day?  
8 Q Yes.  
9 A No, sir, I wasn't.  
10 Q All right. And do you know where it went  
11 from Captain Randy Vincent, firsthand  
12 knowledge?  
13 A No.  
14 Q All right.  
15 MR. CORRY:  
16 Steve, it's 1:00. Do you want to  
17 take your break and come back, meet back  
18 here about 1:45?  
19 MR. SPRING:  
20 Yes, that would be great.  
21 MR. CORRY:  
22 All right.  
23 (LUNCH BREAK TAKEN FROM  
24 1:04 P.M. UNTIL 1:54 P.M.)  
25 MR. CORRY:



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1 Q Let me back up.  
2 You were transferred to Precinct 4,  
3 night shift, which took effect on June 10th  
4 of '12; is that accurate?  
5 A Correct.  
6 Q Okay. So you were no longer in patrol  
7 support?  
8 A The letter came out May the 2nd -- 22nd. You  
9 got that?  
10 Q Yes.  
11 A The same day the TRO was filed.  
12 As a matter of fact, the letter of  
13 transfer came out that afternoon.  
14 Q And that was the TRO that was filed in state  
15 court to stop the Mclean investigation?  
16 A That's correct.  
17 Q Okay. So when you were in Precinct 4, night  
18 shift, you were no longer in patrol support?  
19 A That's correct.  
20 Q And worked from June 10th, until your  
21 termination?  
22 A September 12th, 2012 is the year.  
23 Q September 12 of '12?  
24 A Yes.  
25 Q That was your last day of work?

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1 documents in front of you to specifically  
2 look at. But anything else that you think is  
3 significant that we did not talk about?  
4 A In the Dartez --  
5 Q Regarding the Dartez incident.  
6 A Yes. But I don't know if you want to address  
7 that now or --  
8 Q With the documents?  
9 A (Witness nods affirmatively.)  
10 Q Why don't you tell me what it is?  
11 A Well, I just make the analogy of despaired  
12 treatment. When we were discussing about the  
13 David Leblanc being reluctant in reporting it  
14 because of fear of reprisal was down the  
15 road, I had referenced Greg Randall and his  
16 ordeal, which you were aware of it because  
17 you represented the city in his appeal  
18 hearing for the five-day suspension for  
19 failing to properly investigate an incident  
20 at Lafayette High.  
21 Now, there was a supreme board case  
22 after Greg Randall, in which Stephen Bajat  
23 investigated another employee of Acadiana  
24 High, in which this gentleman right here that  
25 you're reading -- there's a newspaper

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1 A If I'm not mistaken, according to the letter.  
2 MR. SPRING:  
3 Is it '12?  
4 MR. CORRY:  
5 Q And I've got that. It's in the book. We'll  
6 get the exact date.  
7 A Okay.  
8 Q But you worked from June 10th, until your  
9 termination day?  
10 A That is correct.  
11 Q Okay. And all the while in Precinct 4, night  
12 shift?  
13 A That's correct.  
14 Q And who was your chain?  
15 A Captain Cornell Montgomery, Major George  
16 Jackie Alfred, and Police Chief James P.  
17 Craft.  
18 Q All right. Let's go back to the Dartez  
19 incident.  
20 Is there anything else about the Dartez  
21 incident that we did not cover? I know  
22 there's some documents and I know there's  
23 some allegations in the lawsuit that I'm  
24 going to take you through.  
25 So when we -- you'll have those

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1 article -- provided information initially to  
2 Agent -- if I'm not mistaken -- William  
3 Sherman, as well as ADA -- or USADA, Luke  
4 Walker.  
5 Q And let's hold off one second. I think this  
6 is new documents.  
7 MR. CORRY:  
8 Did you produce these?  
9 MR. SPRING:  
10 Did you put it in the notebook?  
11 THE WITNESS:  
12 Yeah.  
13 MR. SPRING:  
14 I never got a copy of the notebook.  
15 I've never seen that.  
16 THE WITNESS:  
17 You can even see the holes in  
18 which, I made an extra copy.  
19 MS. COREIL:  
20 I don't recognize this.  
21 MR. CORRY:  
22 And I don't recognize seeing that  
23 either. You know, to make it run  
24 smoother, for your benefit and for ours,  
25 it's just important that we get

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1 everything. I mean, y'all have produced  
2 documents to us three times.  
3 THE WITNESS:  
4 Mr. Corry -- go ahead. I don't  
5 mean to cut you off.  
6 MR. CORRY:  
7 Well, and I don't know where the  
8 breakdown is. But it's --  
9 A I can tell you this, when Uletom Hewitt had  
10 his deposition, and I came in and Mr.  
11 Alexander was sitting right over there, I  
12 brought in a black binder.  
13 MR. CORRY:  
14 Q You gave us a copy.  
15 A This (indicating) was in that black binder.  
16 Q It's not in our black binder.  
17 A Now, I don't know what to tell you, if it  
18 disappeared.  
19 Q Well, I can tell you this, we didn't take any  
20 documents out of your black binder. We  
21 copied the black binder, and it's part of  
22 this record, and we Bates stamped it.  
23 A Mr. Corry, I never insinuated that you did.  
24 I can assure you as a system of checks and  
25 balance, if we would have sat there and went

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1 Do you want to --  
2 MR. CORRY:  
3 Q Let me kind of summarize it, if I can.  
4 It's your belief that Dartez was treated  
5 differently than perhaps other officers  
6 regarding that incident?  
7 A Well, not only Dartez. Prior to that, they  
8 had already established a pattern where if  
9 you're a favorite son of the chief or the  
10 powers that be, that you're going to get  
11 preferential treatment.  
12 This is a shining example in which, the  
13 whole irony of the thing is, and it can cross  
14 over to racial lines. Greg Randall received  
15 a five-day suspension for allegedly failing  
16 to properly investigate an investigation.  
17 But yet, thereafter, Stephen Bajat conducted  
18 another investigation, which was a  
19 springboard from this initial investigation,  
20 where he setup an interview with an alleged  
21 suspect, and failed to even, you know, find  
22 out prior to him even indulging himself into  
23 the investigation that he didn't have a  
24 particular crime. The suspect was Elizabeth  
25 Savoy. She wound up committing suicide as

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1 through every page, and to assure that, then  
2 there wouldn't be any discussion about --  
3 Q Why don't we do this, to make it easier for  
4 flow purposes, why don't we take this  
5 document, and then I know you -- there were a  
6 few other documents that were not in the  
7 binder that you made copies, that we made  
8 copies of. Let's do that at the end of all  
9 the documents. We'll go through all of these  
10 documents, and that way it'll refresh your  
11 memory as to what we have.  
12 We can identify what we have for the  
13 record. And then, we're through with the  
14 ones that we Bates stamped and marked, then  
15 we can get into the documents that perhaps  
16 weren't in there for whatever reason.  
17 A Okay, sir.  
18 Q And that way it'll make it easier for you and  
19 easier for us.  
20 A Okay. So do you want me to continue to  
21 elaborate on that or wait until the end?  
22 Q Just tell me about -- we'll talk about the  
23 document when we get to it, but just tell me.  
24 So it's your --  
25 MR. SPRING:

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1 opposed to being exposed publicly in the  
2 media. And there was no crime.  
3 Q All right. And we'll get to that.  
4 Let's -- I want you to tell me how the  
5 Dartez incident, specifically Dartez, not  
6 these other ones. We'll get to those.  
7 Dartez specifically, how is it -- how do you  
8 think that affects your lawsuit?  
9 A How that what?  
10 Q Why is that relevant to your lawsuit?  
11 A Because of despaired treatment, the way most  
12 black officers when they are investigated for  
13 an alleged misconduct, they're treated  
14 harshly by, particularly Chief Craft, because  
15 he's the ultimate person that renders the  
16 decision on the investigation, as opposed to  
17 white officers.  
18 And I was making the analogy, the same  
19 investigation where he didn't investigate it  
20 appropriately, he didn't even receive a  
21 verbal warning. And this lady lost her life.  
22 She committed suicide because of his  
23 ineptness. But nothing was done to him.  
24 But yet Greg Randall got a five-day  
25 suspension, and he did investigate it

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1 properly. It went to civil service, and they  
2 agreed and overturned Chief Craft's five-day  
3 suspension.  
4 That's just one shining example of  
5 what --  
6 Q Okay.  
7 A It's applicable to our lawsuit.  
8 Q Okay. And how is Dartez? How was he treated  
9 differently?  
10 A How was Dartez treated differently?  
11 Q Yes.  
12 A Dartez was never placed on administrative  
13 leave. He was forced -- Chief Craft was  
14 forced to put him on administrative leave  
15 after everyone in the police department found  
16 out that he was at the scene of a homicide  
17 and never rendered any type of assistance,  
18 and failed to even mention he was there.  
19 And even afterwards, when we discovered  
20 that the key witness in which the argument  
21 started over was there and was picked up by  
22 him, he refused to provide information on how  
23 to get in contact with this person, which is  
24 obstruction of justice.  
25 Q When he was placed on administrative leave,

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1 Q The one that you and Poiencot were involved  
2 with?  
3 A Poiencot.  
4 Q Poiencot.  
5 A Poiencot.  
6 Q Poiencot. Scott.  
7 A All right.  
8 Q Scott.  
9 A Okay.  
10 Q What was the outcome of Gabe's? Did it go to  
11 discipline, or did he retire?  
12 A Which one are you referring to, Mr. Corry?  
13 Q Regarding the Mclean document.  
14 A (No response.)  
15 Q Was Gabe disciplined, or did he retire?  
16 A The Mclean document, he was exonerated. But  
17 he never got an official letter. It went  
18 to --  
19 Q Go ahead.  
20 A I'm going to answer the question.  
21 Q That's fine.  
22 A But you're cutting me off.  
23 Q I don't want to cut you off.  
24 A As you recall, you were present at that civil  
25 service hearing behind the administrative

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1 was it because an investigation had been  
2 started, or do you know? Do you know why  
3 Dartez was placed on administrative leave?  
4 A He was placed on administrative leave after  
5 the media got involved and he was exposed.  
6 Q Do you know why, though? Was it because of  
7 this incident that you described?  
8 A Yes, because of this incident.  
9 Q That's what I'm trying to -- (Interrupted)  
10 A Yes.  
11 Q Okay. And do you know the outcome of that  
12 investigation?  
13 A He retired before the chief rendered a  
14 disposition on what was going to happen. But  
15 there's a recording of the chief telling him  
16 that it's a possibility that he's going to be  
17 suspended at a bear minimum, or terminated.  
18 Q Okay.  
19 A So prior to taking -- or taking a chance on  
20 his fate in the hands of the chief --  
21 Q He retired?  
22 A -- he decided to retire.  
23 Q Okay. What was the outcome of Gabe  
24 Thompson's investigation?  
25 A Which investigation?

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1 leave issue with my racing heart. At the  
2 tail end of the hearing in which there was an  
3 issue as far as me alleging that I didn't  
4 have a racing heart, and I didn't divulge  
5 that information to either Joey Provost or  
6 Dwayne Prejean. And they saying I did. I  
7 went up and told them the only compelling  
8 evidence that would dispute either of our  
9 assertions would be the prerecorded statement  
10 from the polygraph.  
11 And it took them awhile, but they  
12 finally went and they got it, and it came  
13 back, and I never said that.  
14 And at the conclusion of this, the board  
15 ruled that they need -- they weren't going to  
16 get an extension, and they said -- Norbert  
17 Myers, Scott Poiencot and Gabe Thompson, they  
18 asked -- they asked them what is the status  
19 of it? And they said, well, they basically  
20 exonerated, nothing occurred.  
21 So in essence, in the open meeting, they  
22 said, they were cleared of it.  
23 Q Did Gabe retire, or was he disciplined?  
24 A For which incident?  
25 Q I'm asking you. How did he end his career at

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1 the Lafayette Police Department?

2 A Mr. Corry, I cannot answer as far as what

3 he --

4 Q You don't know?

5 A City hall. No, I can't.

6 Q Okay.

7 A That's a personal issue.

8 Q All right. Was there anything that prevented

9 you from retiring?

10 A Yes.

11 Q What?

12 A I was terminated.

13 Q Could you have -- when you were given an

14 administrative leave notice, could you have

15 gone and retired at that point?

16 A Why would I retire for something I didn't --

17 I'm answering the question.

18 Q No. You've got to answer it yes or no.

19 MR. SPRING:

20 Then you can explain.

21 MR. CORRY:

22 Q Then you can explain all you want.

23 A Okay. Repeat the question.

24 Q Was there anything that prevented you from

25 retiring when you received the administrative

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1 clerk. I was served inventory that needed to

2 go to the Wal-Marts in this -- the particular

3 region that the distribution center was in.

4 And I would get an order, and we would fill

5 the order.

6 Q What was your rate of pay when you were

7 terminated? Were you paid salary, or by the

8 hour? How are you paid?

9 A We were paid by the hour. If memory serves

10 me correct, I was making \$34.32 an hour.

11 Q What did that translate into a yearly salary?

12 A I can't answer that, Mr. Corry. I'd have to

13 see the --

14 Q And what were you making at Wal-Mart?

15 A \$15.25 an hour.

16 Q 40 hours a week?

17 A 36.

18 Q Did you have any benefits?

19 A Yes.

20 Q What?

21 A Medical.

22 Q They paid for it?

23 A No. It came out of your check. It was a

24 deduction out of your payroll check.

25 Q You paid 100 percent of it?

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1 leave notice regarding the investigation that

2 you were ultimately terminated for?

3 A No, there was nothing that could have

4 prevented me from retiring.

5 Q Okay. And there's no difference with Glen

6 Dartez, either. He chose to retire, as you

7 say, prior to the investigation running its

8 course and him being disciplined?

9 A No, sir. He was told what was going to be

10 the outcome of the investigation way before

11 he decided to retire. He retired after he

12 was told, he was going to receive some form

13 of discipline up to termination.

14 Q Okay.

15 A No one told me that. There's a difference.

16 But I didn't retire because I didn't do

17 what I was accused of doing.

18 Q After you were terminated, where did you go?

19 Where were you employed?

20 A I was employed at Wal-Mart Distribution

21 Center for a month.

22 Q October of '12?

23 A Uh-huh (yes). Yes.

24 Q What did you do?

25 A I guess, if you want to call it, inventory

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1 A What?

2 Q You paid 100 percent?

3 A No, they paid a certain percentage that they

4 paid. I can't give you the exact amounts.

5 Q You benefits with the city, health insurance.

6 Did you have to pay a portion of that?

7 A Yes.

8 Q Was it because your family was on it? Does

9 the city pay 100 percent of an officer's

10 health insurance?

11 A No, sir.

12 Q Okay. You have to pay a percentage?

13 A Yes. It's mandatory.

14 Q Do you know what percentage it is you pay?

15 A I'd have to look.

16 Q That's fine.

17 A Do you still want me to answer it, or look

18 through --

19 Q No, we'll get to it.

20 Roughly?

21 A (Witness shakes head negatively)

22 Q You don't know?

23 A No.

24 Q What other benefits did you have?

25 A With Wal-Mart or the city?



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1 Q With LPD.  
2 A LPD. That is pretty much the extent of it.  
3 Q Sick leave, I guess, which was accrued in  
4 annual leave?  
5 A I thought you were referring to medical.  
6 Q No. I was referring to benefits.  
7 A Okay.  
8 Q All benefits.  
9 Sick leave, annual leave. What else?  
10 A On the annual, since I was terminated, I  
11 forfeit my sick leave and accrued time.  
12 Q Did you have any accrued time? I thought you  
13 had used it all for that month and a half  
14 before you started that new -- (Interrupted)  
15 A Not -- not sick leave.  
16 Q How much sick leave did you have?  
17 A I don't know, Mr. Corry. I only missed two  
18 days. So if you would calculate 22-1/2  
19 years, minus two days, that would give you  
20 the figure. I can't tell you.  
21 Q Do you know what it is, roughly?  
22 A No, sir. I wasn't concerned about that,  
23 because I anticipated on retiring at 33  
24 years. So I wasn't concerned about that at  
25 this juncture.

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1 A Yeah. 9th or 12th, somewhere around there.  
2 Q Of 2012, though?  
3 A That's correct.  
4 Q And what is your position?  
5 A Investigator.  
6 Q And what is your rate of pay?  
7 A \$15.35, something like that.  
8 Q An hour?  
9 A Yes, sir.  
10 Q Do you work 40 hours a week?  
11 A Yes.  
12 Q Do you work overtime?  
13 A Yes.  
14 Q How much?  
15 A It varies.  
16 Q Who is your supervisor?  
17 A Captain Ivory Chevis.  
18 Q Is there a major on top of him?  
19 A No, sir.  
20 Q He reports for the sheriff?  
21 A No, sir.  
22 Q Who does he report to?  
23 A He reports to Chief Deputy Hilman  
24 Popillion.  
25 Q And he reports to the sheriff?

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1 Q What -- how many years did you have in, 22?  
2 A 22-1/2.  
3 Q And you were going to retire at?  
4 A At least 33.  
5 Q All right. And how much annual leave did you  
6 have accrued?  
7 A I can't tell you that.  
8 Q Is it by hours or by days?  
9 A You asked me how much annual leave I accrue  
10 over a year period, or --  
11 Q No, no.  
12 A -- how much I had at the current time?  
13 Q At the time you were terminated.  
14 A I cannot answer that, sir.  
15 Q Any other benefits you had with the city?  
16 A That's all I can think of.  
17 Q Okay. And you went to Wal-Mart. Where did  
18 you go after that?  
19 A St. Landry Parish Sheriff's Department.  
20 Q And is that where you are currently employed?  
21 A Yes, sir.  
22 Q When did you start there?  
23 A December 9th, or December 12th, somewhere in  
24 that vicinity.  
25 Q Of '12?

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1 A Mr. Popillion?  
2 Q Yes.  
3 A Yes, sir.  
4 Q The sheriff is?  
5 A Bobby J. Guidroz.  
6 Q Have you had any incidences at the St. Landry  
7 Parish Sheriff's Office where you've been  
8 disciplined for any reason?  
9 A No.  
10 Q Have you had any injuries?  
11 A No.  
12 Q What is your work schedule?  
13 A 8:00 a.m. to 4:30.  
14 Q Monday through Friday?  
15 A Yes.  
16 Q What do you investigate? Are you assigned to  
17 a particular unit or division, how is it  
18 broken up?  
19 A I'm assigned to adult investigations,  
20 investigate all crimes committed by adults,  
21 as well as crimes committed against adults,  
22 be it persons or property crimes.  
23 Q Other than the investigation where you  
24 received a letter of reprimand for having the  
25 -- your investigation -- that shift level



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1 investigation go over 60 days, and the  
2 investigation where you were ultimately  
3 terminated in September of 2012, did you have  
4 any other investigations that you were  
5 involved in at the Lafayette Police  
6 Department? Were you the subject of the  
7 investigation?  
8 A No, sir.  
9 Q Did you ever receive any discipline, other  
10 than a letter of reprimand prior to this  
11 termination?  
12 A What do you consider discipline?  
13 Q Anything.  
14 A Well, that's a subject that -- it's an  
15 open-ended question. It's kind of ambiguous.  
16 Because certain individuals consider  
17 counseling form discipline, and others say  
18 it's not.  
19 Q Did you receive any counseling forms at the  
20 Lafayette Police Department?  
21 A The problem we have with that is you're not  
22 even supposed to see this one, because after  
23 a year, it's supposed to be expunged from  
24 your record. So how are you going to say  
25 it's discipline if it's not there any more?

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1 Do you remember what they were for? Two  
2 separate incidents, I guess?  
3 A Yes, sir. One was missing court.  
4 Q Had a subpoena to attend a hearing, or trial,  
5 or something, and you didn't go?  
6 A No. It wasn't that, that happened. I was in  
7 criminal investigation. I made the assistant  
8 DA aware that if you need me, I can respond  
9 within a 30-minute time frame. And there was  
10 a communication gap, where they still gave me  
11 a counseling form and said it was my fault.  
12 Q Okay. And what was the other one?  
13 A Being late five minutes for duty, for the  
14 train derailment.  
15 Q That's the one that happened a few years ago  
16 by the Ambassador Caffery?  
17 A Yes.  
18 Q Who was your chain for the missing court  
19 counseling form?  
20 A Sergeant Dave Morris. I can't remember who  
21 was the lieutenant and the captain. I don't  
22 know if it was Chief Craft or not.  
23 Q And what about the train derailment?  
24 A It was Lieutenant Mac Gallien, Captain Randy  
25 Vincent, and Major Glen Dartez.

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1 Q Well, I'm asking you a very direct question.  
2 MR. SPRING:  
3 Just answer his question.  
4 A All right. Yes.  
5 MR. CORRY:  
6 Q Did you ever receive a counseling form?  
7 A Yes.  
8 Q How many?  
9 A Two.  
10 Q And what were the dates of them?  
11 A I can't --  
12 Q Roughly?  
13 A I can't tell you.  
14 Q What years were they in?  
15 A I'm not going to be able to answer that  
16 question.  
17 Q Are they contained in your material?  
18 A I'm sorry?  
19 Q Are they contained in the material that  
20 you've produced?  
21 A No, sir. I wouldn't be able to retrieve it  
22 because it happened after the year time  
23 frame. It's not supposed to be in there.  
24 Q Okay. I just didn't know if you had a copy  
25 of them.

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1 Q Do you anticipate being at the Lafayette  
2 Parish -- excuse me. Scratch that.  
3 Do you anticipate being at the St.  
4 Landry Parish Sheriff's Office for the  
5 foreseeable future?  
6 A I can't answer that question, Mr. Corry. I  
7 don't know what lies in my future.  
8 Q Do you plan on leaving?  
9 A No. I plan on appealing my termination and  
10 being exonerated.  
11 Now, at that point, I don't know what's  
12 going to happen after that.  
13 Q Okay. You received a copy of the general  
14 orders at some point, when you were with the  
15 Lafayette Police Department, that were made  
16 available to you?  
17 A Yes.  
18 Q And the PPM's, as well?  
19 A Some PPM's.  
20 Q Did you have the ability to gain access to  
21 all PPM's?  
22 A Not all the time.  
23 Q Pardon?  
24 A Not all the time.  
25 Q I mean, at some point in time, you were able

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1 to get all of them?  
2 A Yes.  
3 Q Okay. Have you ever filed an EEOC claim?  
4 A No, sir.  
5 Q Have you ever filed a workers' compensation  
6 claim?  
7 A No, sir. You asked me that question already.  
8 Q Did I? I'm sorry.  
9 Have you ever filed a grievance with LPD  
10 or LCG?  
11 A No, sir.  
12 Q Have you ever run for any type of political  
13 office?  
14 A No, sir.  
15 Q Did you ever run for any type of office  
16 within the police department?  
17 A No, sir.  
18 Q Have you ever had to undergo a fit for duty  
19 evaluation?  
20 A What do you consider a fit for duty?  
21 Q Where you were sent to a doctor to see if you  
22 were fit for duty?  
23 A When I initially applied for the police  
24 department in 1990.  
25 Q None after that?

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1 Q Regarding the -- (Interrupted)  
2 A -- making false testimony.  
3 Q Both of those complaints were filed with  
4 civil service?  
5 A Yes.  
6 Q And what was the outcome of the Bejsovec?  
7 A The outcome of Bert Bejsovec, the human  
8 resource conducted an investigation and it  
9 was unfounded. And I appealed it to civil  
10 service, and that's where the implementation  
11 of the stay order, and it's still in limbo.  
12 Q Okay. And then, what about the Dwayne  
13 Prejean, Jim Craft, Joey Provost?  
14 A The same thing. A stay order was  
15 implemented, they would not hear it.  
16 Q Did you -- HR had nothing to do with that,  
17 correct?  
18 A With what?  
19 Q Prejean, Craft and Provost.  
20 A No, sir.  
21 Q So as you appreciate it, they're still  
22 pending with civil service to be heard at  
23 some later date, or has there been a decision  
24 by civil service not to hear them?  
25 A There was no decision. The decision was

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1 A No, sir.  
2 Q Were you ever the subject of an IA  
3 investigation?  
4 A Yes.  
5 Q Other than the one where you were ultimately  
6 terminated, any others?  
7 A No, sir.  
8 Q Have you ever filed a complaint against  
9 another member of the LPD?  
10 A Yes, sir.  
11 Q How many times?  
12 A Once.  
13 Q And that was the payroll incident with  
14 Lieutenant Bejsovec?  
15 A I take that back. Twice.  
16 Q All right. What was the first one?  
17 A The first one was Lieutenant Bert Bejsovec.  
18 Q And we're going to get to that, because I  
19 know you have some documents.  
20 A Uh-huh (yes).  
21 Q What was the other one?  
22 A The second one was for Dwayne Prejean, Joey  
23 Provost, and Jim Craft, the police chief, for  
24 the administrative leave issue for them  
25 appearing in civil service, and --

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1 there was going to be a stay order until the  
2 federal lawsuit was resolved. Because there  
3 was same issues that we were addressing in  
4 the lawsuit was going to be addressed in the  
5 civil service, which I don't know how they  
6 made that association.  
7 Q Any other complaints against any other police  
8 officers?  
9 A No, sir.  
10 Q Any other complaints against any other  
11 employees of LCG?  
12 A Official complaints?  
13 Q Yes.  
14 A No, sir.  
15 Q What about unofficial?  
16 A What do you mean, "unofficial"?  
17 Q I don't know, you said, you mean official, so  
18 I thought you meant something else.  
19 A I just wanted to make some clarity in it. We  
20 can -- you know, I can see somebody and say,  
21 hey, man, I don't like what this guy did.  
22 That's --  
23 Q Officially, you haven't gone to complain  
24 about anything?  
25 A No, sir. Apart from them two, no.

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1 Q Have you filed any other complaints at the  
2 Civil Service Board, other than the two that  
3 you told me?  
4 A No. That would be it, because an appeal is  
5 not one.  
6 Q Have you ever published anything related to  
7 your employment with LPD, or involving LPD,  
8 with anyone?  
9 A No.  
10 Q When did you first decide to file the TRO?  
11 A I can't give you an exact date, Mr. Corry. I  
12 know it was -- I guess when I was officially  
13 served with the notice of investigation. The  
14 first notice of investigation, I guess.  
15 Q Who did you consult with? And I'm not  
16 talking about attorneys.  
17 A In relation to?  
18 Q Filing the TRO.  
19 A I guess my wife.  
20 Q Okay. Anybody else?  
21 A I can't remember pinpointing an exact person.  
22 I'm pretty sure there was some dialogue  
23 between the people on the lawsuit. But as  
24 far as me specifically saying, yes, I spoke  
25 to this gentleman here. I'm not going to be

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1 A (Witness shakes head negatively.)  
2 Q You've got to respond out loud.  
3 A No..  
4 And when you said doctor it and gave it  
5 to someone, who are you referring to, that I  
6 gave it to?  
7 Q I'm asking the questions today.  
8 A I'm aware of that, Mr. Corry. I don't mean  
9 to come across being --  
10 Q And I was speaking in general terms.  
11 A Okay. Well, that's the only clarity I wanted  
12 to specify.  
13 Q I'm speaking in general terms.  
14 A Okay.  
15 Q You were not aware that that would be a  
16 violation of general orders or PPM's, before  
17 being given a notice of investigation,  
18 specifically for the Mclean incident?  
19 A No, sir. Because that was done in the past.  
20 Q Was it?  
21 A Yes.  
22 Q Had you ever done it in the past?  
23 A No. It wasn't me, but it was done in the  
24 past.  
25 Q Did you have firsthand knowledge of it being

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1 able to answer that.  
2 Q What was the discussion amongst you and the  
3 other members of the lawsuit about filing  
4 that TRO?  
5 A I can't recall everything. I know we  
6 discussed numerous issues, as far as how this  
7 started, when the investigation started  
8 officially, who was investigating it, who was  
9 the complainants, it being a conflict. Just  
10 overall, that it wasn't going to be a fair  
11 and impartial investigation. And it needed  
12 somebody pretty much outside the realm of the  
13 normal arbitrary process that the classified  
14 civil service employee used, and that venue  
15 would be the court system.  
16 Q Okay. Isn't it a violation of the general  
17 orders of the PPM's to take a document out of  
18 a closed IA investigation, or shift level  
19 investigation, doctor that, white it out, and  
20 give it to someone, leak it to someone to use  
21 in another proceeding? Is that a  
22 violation?  
23 A I was made aware of that when I was served  
24 with a notice of investigation.  
25 Q You didn't know that before?

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1 done in the past?  
2 A Yes.  
3 Q How? Not what somebody told you, but what  
4 you actually -- (Interrupted)  
5 A I have a document of it.  
6 Q Okay.  
7 A Heather Martin.  
8 Q Okay. We'll get to that.  
9 A Okay.  
10 Q Any other incidents that you recall?  
11 A What are you referring to, Mr. Corry?  
12 Q Where a document was taken out of a shift  
13 level or an IA investigation, whited out, or  
14 doctored, and then used in another  
15 proceeding?  
16 A No.  
17 Q Do you know the outcome of the Mclean appeal?  
18 A No, sir.  
19 Q So you think you spoke with Scott about the  
20 TRO?  
21 A I never named Scott at all.  
22 Q I'm asking you now.  
23 A I said I don't remember the individuals.  
24 Q Okay.  
25 A So I don't want to go on the record saying I

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1 spoke to this particular individual.  
2 Q Okay. Well, I've still got to ask you. If  
3 you don't know, that's fine.  
4 A Okay.  
5 Q If you don't remember, that's fine.  
6 Scott, you don't recall, or you don't  
7 know one way or the other?  
8 A One way or the other, I don't know.  
9 Q What about Mr. Hewitt?  
10 A Same response, I don't know one way or the  
11 other.  
12 Q What about Mr. Thompson?  
13 A Same thing.  
14 Q What about Mr. Marceaux?  
15 A Same thing.  
16 Q What about Mr. Myers?  
17 A If I definitely spoke to him?  
18 Q Yes, about the TRO.  
19 A No, I don't remember if I spoke to him or  
20 not.  
21 Q Would it be the same answer if I asked you  
22 about every person at the Lafayette Police  
23 Department at the time the TRO was issued,  
24 that you don't know one way or the other if  
25 you spoke to them about the TRO?

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1 federal lawsuit?  
2 A Because of all the things that we cited in  
3 the federal lawsuit. Particularly me,  
4 starting with the investigation that wasn't  
5 fair and impartial from the onset. And other  
6 issues that was transpiring at the police  
7 department.  
8 Q Such as?  
9 A Despaired treatment, the words black officers  
10 versus white officers, favoritism. I can't  
11 give you exactly every one, but the list goes  
12 on and on, and is still going.  
13 Reprisals for reporting misconduct,  
14 reprisals for exercising your arbitrary  
15 process, and filing an appeal for any  
16 discipline that is rendered, stuff like that.  
17 Q What misconduct did you report --  
18 A Bert Bejsovec.  
19 Q -- where you suffered reprisals?  
20 A Bert Bejsovec.  
21 Q Well, that was investigated, was it not?  
22 A You -- are we going to get to that now, or  
23 later?  
24 Q I'm just asking a question. We're going to  
25 get to all the documents.

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1 A There was a lot of discussion about that TRO.  
2 Q Do you recall who specifically you talked to  
3 about it?  
4 A (Witness shakes head negatively.)  
5 Q You've got to respond out loud?  
6 A Apart from -- no. I'm rubbing my head first  
7 before I respond.  
8 Q Okay.  
9 A Apart from my attorney?  
10 Q Yes. I don't want to know anything that you  
11 talked to with your attorney.  
12 A I'm trying to get some clarity on, besides my  
13 attorneys, you're asking -- is that the  
14 question you're asking? Besides the  
15 attorneys, is there anyone else in  
16 particular?  
17 Q Yes. That's the question I asked.  
18 A That's an open-ended question, I can't answer  
19 that.  
20 Q Okay. When did you first decide to file the  
21 federal lawsuit?  
22 A I can't give you an exact date, Mr. Corry.  
23 Q Why?  
24 A I'm sorry. What you said?  
25 Q Why did you decide to be a party in the

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1 A Okay.  
2 Q I'm just asking you a question.  
3 A No, no. The answer, that's what I'm getting  
4 at, because it's going to take some  
5 elaboration. Because you're saying it was  
6 investigated. My contention is, it wasn't  
7 properly investigated.  
8 Q Okay.  
9 A But to answer the question, yes, it was.  
10 Q All right. And the outcome of that  
11 investigation was what?  
12 A Initially by human resource, it was  
13 unfounded.  
14 Q Okay. Has there been any follow-up to that  
15 investigation?  
16 A Yes. I appealed it to civil service and it's  
17 still pending.  
18 Q Okay. That's what we discussed earlier?  
19 A Yes.  
20 Q All right. Any other contentions of why you  
21 decided to file the federal lawsuit, other  
22 than what you told me?  
23 A That pretty much sums it up, with the  
24 exception of, also to make people outside of  
25 the proverbial white house that they call it,



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1 900 East University, make people aware of  
2 what is actually going on, and that the  
3 department should be a transparent  
4 department, and the fine citizens of  
5 Lafayette and the taxpayers should be knowing  
6 what is going on in the department that  
7 they're paying the salary for.  
8 But obviously, that's not the case. And  
9 what is the profound statement that was ever  
10 made throughout the course of all of this  
11 came from Major George Jackie Alfred, in  
12 which he said, you're not going to air out  
13 the department dirty laundry in the general  
14 public and walk away and think nothing's  
15 going to happen.  
16 Now, that, I can assure you, Mr. Corry,  
17 they made good on that statement.  
18 Q Was that part of the recording that was  
19 played to Judge Earles in the TRO?  
20 A I can't definitely tell you that. I know  
21 there was a recording of Major Alfred with  
22 Gabe Thompson, in which he made that  
23 statement. And that came on the heels of me  
24 filing the complaint with Bert Bejsovec. As  
25 well as Kane Marceaux filing a complaint on

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1 MR. CORRY:  
2 Q You can explain, but you have to answer  
3 first.  
4 Are there any recordings that you have  
5 of anyone at the Lafayette -- (Interrupted)  
6 A We're back on?  
7 Q Yes, we're back on.  
8 A All right.  
9 Q Are there any recordings that you have of  
10 anyone at the Lafayette Police Department  
11 that you have not provided to us?  
12 A The response to that question is, I made the  
13 recordings. I gave them to Scott Poiencot  
14 and retired Captain Norbert Myers.  
15 Now, at that point, I don't know if they  
16 provided it to --  
17 (INTERRUPTION IN DEPOSITION)  
18 MR. CORRY:  
19 Q Are you ready, Greg?  
20 A Yes.  
21 Q So you don't know if those recordings that  
22 you made have not been given to us?  
23 A That question would be better suited to most  
24 probably Scott Poiencot.  
25 Q Okay. Turn to GC-139.

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1 him, as well.  
2 Q Okay. Do you know if that was a recording  
3 that was played for Judge Earles?  
4 A I can't remember that, Mr. Corry. That's two  
5 years ago. No.  
6 Q Were you present at the hearing on the TRO?  
7 A Yes.  
8 Q Have you made any recordings of anyone?  
9 A Yes.  
10 Q How many?  
11 A I can't give you a number.  
12 Q More than ten?  
13 A I don't think so. I don't think it's ten.  
14 Q Have you provided us copies of all recordings  
15 you've made?  
16 A That, I'm not sure. I provided copies of the  
17 most relevant recordings.  
18 Q Okay. Well, I think the discovery asked for  
19 all recordings.  
20 Are there any recordings that you have  
21 of anyone at the Lafayette Police Department  
22 that you have not provided?  
23 A Listen, I'm going to answer it and  
24 hopefully --  
25 (INTERRUPTION IN DEPOSITION)

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1 A (Witness complies.)  
2 Q I guess look at 138, and then, 139, the page  
3 before.  
4 A Okay.  
5 Q That's an envelope that contained, I don't  
6 know if it was a zip drive, or a CD, or what  
7 it was, but -- and those were the recordings  
8 that were attributable to you as outlined in  
9 GC-139.  
10 Do you know if there are any others,  
11 other than those?  
12 A (Witness examines documents.)  
13 Q And A bunch of them don't play.  
14 A This should be an updated version that we  
15 submitted.  
16 Q Yes. We'll get to that.  
17 Just as it deals with 139, do you know  
18 if there's anything else?  
19 A The only problem, right offhand, looking at  
20 track 1, 2, and all of that --  
21 Q I don't know what that means.  
22 A -- I can't tell you offhand, but --  
23 Q Did you generate 139?  
24 A No.  
25 Q Do you know who generated it?



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1 A It probably came from the audio files that --  
2 I can tell you this. Alfred retaliation,  
3 that's Gabe.  
4 Civil service hearing, I can't tell you  
5 who provided it, but it's beneficial towards  
6 the interrogatories.  
7 Q Okay. Let me ask you this --  
8 A Go ahead.  
9 Q -- 5/8/12, civil service hearing. Is that  
10 just a recording of the civil service  
11 hearing?  
12 A Most probably, yes.  
13 Q Okay. And then, the May 12, Gremillion  
14 testimony, that's when Lieutenant Gremillion,  
15 or Sergeant Gremillion at that time,  
16 testified, I think it was about the Mclean  
17 document?  
18 A (Witness nods affirmatively.)  
19 Q Is that what that is?  
20 A Yes.  
21 Q Okay. And you don't know what the tracks 1,  
22 2, 1, 4, 3, 2 mean? You don't know what's on  
23 those?  
24 A No, not offhand right now.  
25 Q Okay. Are there any recordings that you gave

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1 A Number 8.  
2 Q Where was that recording made?  
3 A In --  
4 (INTERRUPTION IN DEPOSITION)  
5 MR. CORRY:  
6 Q We're referring to GC-577, number 8, noted,  
7 consensual audio recording, Greg with Dwayne  
8 Prejean, February 14, 2012.  
9 And I asked you, where was that done?  
10 A Lieutenant Dwayne Prejean's former office in  
11 Internal Affairs. Former Lieutenant Phil  
12 Fontenot's office, and my former office in  
13 patrol support.  
14 Q So it was three recordings on February 14th,  
15 2012, in three different offices?  
16 A No, sir. One recording, three different  
17 offices, three different locations.  
18 Q Did Lieutenant Prejean know that you were  
19 recording him?  
20 A No, sir.  
21 Q Did you advise him of his police officer's  
22 bill of rights before you recorded him?  
23 A I wasn't investigating him. No, sir.  
24 Q Okay.  
25 A I need to elaborate on that.

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1 directly to your attorneys?  
2 A No.  
3 Q Everything you recorded, you gave to Scott or  
4 Norbert Myers, and then what they did with  
5 it, you don't know, or do you?  
6 A No. I don't definitely know, but I would  
7 assume they gave it to the attorney.  
8 Q All right. How did you -- does this jog your  
9 memory about any other recordings you may  
10 have made?  
11 A No, sir.  
12 Q All right. Look at GC-576.  
13 A (Witness complies.)  
14 Q There's eight listed on GC-576 and GC-577.  
15 A Are you posing a question to me, Mr. Corry?  
16 Q Yes. There's eight listed.  
17 A Yes, there's eight.  
18 Q Are these all recordings that you made?  
19 A No, sir.  
20 (INTERRUPTION IN DEPOSITION)  
21 MR. CORRY:  
22 Q Did you make any of the recordings noted on  
23 576 and 577?  
24 A Yes.  
25 Q Which one?

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1 Q All right.  
2 A It wasn't an investigation that warranted me  
3 to advise him with his police officer's bill  
4 of rights.  
5 Q All right.  
6 A I wasn't doing anything illegal.  
7 Q Was that before or after the clandestine  
8 recording general order had come out?  
9 A The illegal general order? It was before.  
10 Q Pardon?  
11 A The illegal general order, it was before.  
12 Q Okay. So you made the recording on February  
13 14th, 2012, after there was a general order  
14 issued that said clandestine recordings are  
15 prohibited?  
16 A You're incorrect. The recording came before.  
17 The clandestine recording came way after.  
18 Q Okay. That's what I'm asking. I thought you  
19 said it was before.  
20 So the general order came after February  
21 14th of '12?  
22 A Yes.  
23 Q Okay. Did Lieutenant Philip Fontenot know  
24 that you were recording him?  
25 A No.

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1 Q Okay. Did you advise him of his bill of  
2 rights before you recorded him?  
3 A No. Once again, it wasn't an investigation,  
4 so he didn't need to be afforded the police  
5 officer bill of rights.  
6 Q Go ahead.  
7 A And let me finish.  
8 Before we go any further, Mr. Corry, it  
9 was a standard practice that officers record  
10 other officers, particularly supervisors. It  
11 started with the Gus Sanchez. The reason  
12 they started recording, particularly  
13 supervisors, was because it was a common  
14 knowledge that supervisors would instruct  
15 officers to perform a task, and when it  
16 wouldn't turn out the results that they were  
17 seeking, the particular supervisor, they  
18 would blame the officer for running rouge and  
19 doing something that he wasn't instructed to  
20 do so.  
21 And then, the officer, when he would  
22 contest what the supervisors were saying,  
23 there was no compelling evidence to  
24 corroborate his assertions. So therefore,  
25 they would always believe the supervisor.

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1 human resource, they dispelled his complaint  
2 until he produced that compelling evidence,  
3 the recording.  
4 Afterwards, an investigation was  
5 launched against Chief Craft, where he was  
6 allegedly disciplined.  
7 At that point, officers started  
8 recording police officers to protect  
9 themselves.  
10 Q Did you ever, as a supervisor, instruct any  
11 of your subordinates to record?  
12 A No, sir.  
13 Q Did you ever accuse anything of your  
14 supervisors -- excuse me, your subordinates  
15 of having going rouge when something didn't  
16 turn out right that you had ordered them to  
17 do?  
18 A No, sir.  
19 Q All right. Who was in your office when this  
20 recording was made, number 8 on GC-577?  
21 A Dwayne Prejean.  
22 Q Anybody else?  
23 A No, sir.  
24 Q How long is the recording?  
25 A I can't give you an exact time.

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1 So they started making a conscientious  
2 decision to record people.  
3 Q Who is "they"?  
4 A Officers, in general.  
5 Gus Sanchez was, I guess, the shining  
6 example, because there was an issue -- well,  
7 his lost radio. And Phil Fontenot and Chief  
8 Craft had a meeting with him and Chief --  
9 Q You can finish, but let me just ask you.  
10 Were you directly involved in that, or that's  
11 just something that you heard, hearsay?  
12 A It's not hearsay.  
13 Q Were you directly involved with it?  
14 A That came exactly from Gus Sanchez.  
15 Q That's hearsay.  
16 Were you involved in that?  
17 A No, sir.  
18 Q All right.  
19 A Will you let me finish?  
20 Q Absolutely.  
21 A Okay. Well, what happened was, he filed a  
22 complaint because of the chief's behavior,  
23 particularly commanding a temporary general  
24 order under professional conduct and  
25 responsibility. He filed a complaint with

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1 Q What did you do -- what did you record it on?  
2 A An ink pen.  
3 Q Pardon?  
4 A An ink pen.  
5 Q Scott's?  
6 A Mine.  
7 Q And what did you do with it after you  
8 recorded it?  
9 A I gave it to Scott to download it, if I'm not  
10 mistaken. It would either be Scott or  
11 Captain Myers. I can't remember which one.  
12 Q Did either one of them work for you, or under  
13 you?  
14 A Who?  
15 Q Scott or Norbert?  
16 A Scott never worked for me. Captain Myers was  
17 a rank above me, so there was no way he would  
18 have possibly have worked for me.  
19 Q Okay. And do you know what they did with the  
20 recording after you gave it to them to  
21 download it?  
22 A No, sir.  
23 Q Did you ever hear it after you recorded it?  
24 A Yes, sir. I heard it from my pen.  
25 Q Okay. After it was downloaded, did you hear

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1 it?  
2 A Yes.  
3 Q When?  
4 A To confirm what the recording was actually  
5 about.  
6 Q Okay.  
7 A The nature of it and the relevance of it.  
8 Q Was there anything that had changed from your  
9 original recording?  
10 A No, sir.  
11 Q Was there anything added?  
12 A No, sir.  
13 Q Was there anything deleted?  
14 A The recording was never edited.  
15 Q You're sure of that?  
16 A I'm positive.  
17 Q Were you with Scott when he downloaded it,  
18 or Norbert? I guess you weren't with either  
19 one because you don't know who downloaded it,  
20 right?  
21 A Correct.  
22 Q Do you know how they transferred it from the  
23 download to give it to your attorneys to  
24 provide it to us?  
25 A No, sir.

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1 A I can't give you an exact date. I know it  
2 was either the day after Kane Marceaux and I  
3 filed the civil service complaint, or it was  
4 two or three days thereafter.  
5 Q Which civil service complaint, for the  
6 record's purposes?  
7 A I filed a civil service complaint on Bert  
8 Bejsovec for payroll fraud. And Kane  
9 Marceaux filed a complaint on retired Major  
10 Jackie Alfred and Chief Craft.  
11 Q Okay. But you don't know the date that that  
12 recording was made?  
13 A No, sir.  
14 Q Do you know who made it?  
15 A Gabe Thompson.  
16 Q Do you know what he made it on, or with?  
17 A No, sir.  
18 Q Do you know what he did with the device that  
19 he made the recording after it was made?  
20 A No, sir.  
21 Q What about number 3, GC-577, consensual  
22 recording, Greg and Reggie Thompson and Gabe  
23 Thompson. Reggie Thomas and Gabe Thompson.  
24 Subject, suspect they were looking at failed  
25 polygraph at CVSA. Did you make that

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1 Q Do you know if it's been provided to us?  
2 A It should.  
3 Q Do you know?  
4 A No.  
5 Q That's the only recording that you were  
6 responsible for that's listed on GC-576 or  
7 577?  
8 A You said responsible. You're referring to --  
9 Q That you made.  
10 A -- that I made, correct?  
11 Q Yes.  
12 A Yes.  
13 Q Number 1 on GC-576, consensual recording,  
14 Gabe and Jackie, recording April 19th, 2012.  
15 That's the one that was played at the TRO  
16 hearing?  
17 A Yes.  
18 Q Okay. And you heard what Judge Earles'  
19 comments were to that, didn't you?  
20 A I can't recall that, Mr. Corry.  
21 Q Okay.  
22 A That's been two years ago.  
23 Q Consensual recording, Gabe and Jackie  
24 recording, call it retaliation. Do you know  
25 when that was made?

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1 recording?  
2 A No, sir.  
3 Q Do you know who made it?  
4 A Gabe Thompson.  
5 Q Do you know when it was made?  
6 A It was in the wake of the Mickey Shunick, so  
7 that would be -- let's see. We filed a TRO  
8 May 22nd. I can't remember what day it was.  
9 I don't know if it was the -- if you give me  
10 if it was a Monday or Tuesday.  
11 But I know thereafter, we had a general  
12 staff meeting. And that's when Chief Craft  
13 came in there complaining about us filing the  
14 TRO, and basically said we should be  
15 concentrating more on the Mickey Shunick, as  
16 opposed to me and them concerning themselves  
17 on that.  
18 So it had to be sometime after in the  
19 wake of Mickey Shunick, because they were  
20 discussing the Mickey Shunick investigation.  
21 Q That's the nature of what this recording is  
22 about, number 3?  
23 A What?  
24 Q That's what's on number 3?  
25 A The meeting, or the Mickey Shunick

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1 investigation?

2 Q I'm asking you what's on the recording.

3 A That's what I'm trying to clarify.

4 Are you asking the question about Mickey

5 Shunick, or are you asking a question about

6 that?

7 (SHORT BREAK TAKEN IN DEPOSITION)

8 MR. CORRY:

9 Q Number 3, I was asking you if the recording

10 contained the contents of what you just

11 described at that meeting where Craft said,

12 y'all need to be focusing on Mickey Shunick,

13 as opposed to -- is that what's on number 3,

14 or you were using that meeting as a reference

15 point for a date?

16 A I was using that meeting as a reference

17 point.

18 Q Okay. What is the significance of -- and you

19 don't know the date of it, you just know

20 about when it was?

21 A Correct.

22 Q Sometime after the TRO?

23 A Yes.

24 Q Do you know what the nature of the recording

25 is?

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1 Lafayette City Police, sheriff's department

2 state police and other agencies. It was a

3 joint task force.

4 Q Who took the lead on it?

5 A Lafayette City Police.

6 Q Were you involved in the Mickey Shunick

7 investigation at all?

8 A No, sir.

9 Q Okay. Number 4, Mark Francis recording.

10 Greg, Scott, Gabe, Mark, and Mark Francis.

11 Do you know when that was done?

12 A There should be two recordings of that. So I

13 mean, one was outside the police department,

14 and that was prior to the TRO, prior to the

15 investigation. It was -- the second one as

16 well, if my memory serves me correct, was

17 also prior to the TRO.

18 Q What does it have to do with your lawsuit?

19 A It has to do with Mark Francis talking about

20 the police chief, and his bad decision

21 making, as well as favoritism, as well as

22 Mark referencing that everybody, inclusive of

23 the chief, believed that I was responsible

24 for Glen Dartez's demise, as well as Mark

25 discussing pretty much how inept the chief

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1 A It was a discussion of what's -- Lieutenant

2 Reggie Thomas came over and he interjected

3 himself in the conversation. And the issue

4 came up about the -- I guess you would say,

5 current status of the Mickey Shunick, and

6 that's when he made reference to how inept

7 the lead investigator, who is Stephen Bajat,

8 was. And he discussed about the suspect, and

9 that they were initially targeting, and that

10 the subject failed the polygraph miserably,

11 as well as the CVSA, the computer-voice

12 stress analyzer test, which is two

13 investigative tools that the Lafayette City

14 Police Department used, or utilized in

15 investigations, particularly administrative

16 investigations, as well as criminal, to try

17 to identify deception.

18 Q Was somebody eventually convicted in the

19 Mickey Shunick case?

20 A Somebody confessed in the Mickey Shunick

21 case, and it wasn't the subject that failed

22 the polygraph and the CVSA.

23 Q Who found the subject that eventually

24 confessed, the Lafayette Police Department?

25 A No. It was a collaborate effort with the

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1 is. And he made reference to the Zeryk

2 Guillory's civil service appeal.

3 Q Okay.

4 A And how it was an embarrassment to the police

5 department to have a chief that basically

6 went up there and was unprepared. And he

7 made the analogy that he shouldn't be police

8 chief in Lafayette, he should be a police

9 chief in a town like Duson.

10 Q Were you involved in the Zeryk Guillory civil

11 service appeal?

12 A No, sir.

13 Q When it says, consensual recording on 1

14 through 8, does Mark Francis know that he was

15 being recorded?

16 A No. He doesn't have to know.

17 Q Simple question.

18 Number 3.

19 A Mr. Corry, hold on. I answered you. You

20 said answer the question, then you can

21 elaborate. Correct?

22 Q Absolutely. Absolutely.

23 A Okay. So prior to you cutting me off, I was

24 trying to elaborate further from the initial

25 response I gave you.



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1 Q All right.  
2 A Okay. So I said, he doesn't have to.  
3 Q All right. Same thing with number 3. Did  
4 Reggie Thomas know that he was being  
5 recorded?  
6 A No, sir. It's -- he doesn't have to, nor do  
7 I have to give him notice that I'm recording.  
8 Louisiana is a one-party consent state.  
9 Q All right. Were the two recordings on 3 and  
10 4 made before or after the general order  
11 about prohibition against clandestine  
12 recordings?  
13 A They were made before.  
14 Q All right. Number 5, consensual audio  
15 recording of Richard Chappuis, August 2012.  
16 Did Mr. Chappuis know that he was being  
17 recorded?  
18 A No, sir.  
19 Q And that's the Richard Chappuis that's on the  
20 Civil Service Board?  
21 A That's correct.  
22 Q Were you present for that recording?  
23 A I sure was.  
24 Q And was there discussion with Mr. Chappuis --  
25 and was Scott Poencot on the board at that

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1 this discussion?  
2 A We were all standing outside, and Mr.  
3 Chappuis interjected himself in a  
4 conversation that we were having, and that  
5 subject matter came up about the  
6 administrative leave, and the circumstances  
7 of how I was placed on administrative leave.  
8 And he expressed his displeasure in how it  
9 was done because he knew it wasn't  
10 appropriate, and it led into the polygraph,  
11 as well as grievances.  
12 Q Who made the recording?  
13 A If I'm not mistaken, I think it is Scott  
14 Poencot.  
15 Q All right. Number 6, consensual audio  
16 recording of Olita Magee and Scott. Did  
17 Ms. Magee know she was being recorded?  
18 A Now, Mr. Corry, you're going to have to pose  
19 that question to Scott Poencot --  
20 Q Fair enough.  
21 A -- because I have no knowledge of that.  
22 Q All right. What does that have to do with  
23 your allegations you made in your lawsuit,  
24 number 6?  
25 A I was terminated for providing a confidential

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1 time, or he had been removed?  
2 A I can't tell you.  
3 Q All right.  
4 A I can't remember.  
5 Q Was there a discussion about a particular  
6 pending matter before the board with Mr.  
7 Chappuis?  
8 A Yes.  
9 Q Which one?  
10 A The administrative leave for my racing heart.  
11 Q Okay. And that was discussed with Mr.  
12 Chappuis during the board meeting?  
13 A No. That was discussed afterwards. It was a  
14 discussion about my racing heart and about  
15 the polygraph, and about Mr. Chappuis saying  
16 he's aware that the Internal Affairs has a  
17 habit of manipulating the polygraph exam to  
18 benefit their outcome.  
19 He also discussed about grievances, and  
20 how it's an unfair process, and that the CAO  
21 always arbitrarily is going to side with the  
22 appointing authority designee, which is Chief  
23 Craft or Chief Robert Benoit, who's the fire  
24 chief.  
25 Q How did -- how was Mr. Chappuis engaged in

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1 document to Olita Magee. In this recording,  
2 she says on three separate occasions, the  
3 investigator that conducted this allegation  
4 of employee misconduct, in which I was the  
5 subject of that investigation and was  
6 terminated, Lieutenant Dwayne Prejean,  
7 approached Ms. Magee on three separate  
8 occasions. The first being from the onset,  
9 in which he showed her the copy of a notice  
10 of investigation with all the officers, and  
11 afforded the opportunity to look at all the  
12 officers. And he posed the question to her,  
13 is any of the officers on there? And she  
14 said no. But they continued the  
15 investigation after that point.  
16 And he went back and questioned her  
17 again. And she said that I had no  
18 involvement, as well as Scott Poencot. Even  
19 put in a brief that Scott Poencot had no  
20 involvement. But he continued the  
21 investigation even though they -- I don't  
22 know how you're going to say it's a fair and  
23 impartial the investigation.  
24 And the third and final time, she said  
25 he was almost coercing her into saying it was



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1 me.  
2 Q How do you know that?  
3 A It's on the recording.  
4 Q It's my understanding it's one recording.  
5 A Exactly.  
6 Q It's three separate events, though?  
7 A She refers to three separate events that  
8 Dwayne Prejean approached her on that  
9 recording.  
10 Q Got you.  
11 Who gave her the document?  
12 A I don't know.  
13 Q You have no knowledge of who gave her that  
14 document that was the subject of that  
15 Mclean?  
16 A I'll refer to my statement. It's going to be  
17 consistent. That statement I provided to  
18 Dwayne Prejean at that time is the same  
19 statement I'm going to refer to now. I don't  
20 know who gave her the document.  
21 As of this point, everybody can -- no  
22 one can tell you. Last I heard, Allyson  
23 Prejean was going around saying it was Greg  
24 Randall.  
25 Q Okay. Do you know when that recording was

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1 Thompson, myself and Scott Poiencot in my  
2 office. And as he passed, we were laughing.  
3 And for some reason, he perceived that as we  
4 were laughing at him, and he was the subject  
5 matter of our conversation.  
6 Q Was he?  
7 A Although that wasn't -- I was about to answer  
8 that for you.  
9 Although that wasn't the case. We were  
10 talking about something totally different.  
11 As a matter of fact, there was never any  
12 dialogue between myself, Scott Poiencot, or  
13 Gabe Thompson concerning the payroll fraud.  
14 Q Were you a party to that recording?  
15 A Which recording?  
16 Q Number 7?  
17 A No, sir.  
18 Q Okay. So it's just something that Scott  
19 recorded, told you about it, and then, you  
20 listened to it?  
21 A Yes, I listened to it.  
22 Q All right.  
23 A Are you going to let me finish?  
24 Q Yes.  
25 A Okay. Chief Craft assured Bert Bejsovec,

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1 made? I guess we would have to ask Scott  
2 that, right?  
3 A Yes, sir.  
4 Q All right. Number 7 -- or anything else on  
5 number 6 that we didn't discuss?  
6 A No. But I can -- no. Go ahead, we'll get to  
7 number 8.  
8 Q Okay. Number 7, Jim Craft, April 13th, 2012,  
9 with Scott. What does that have to do with  
10 anything? And before you answer that, have  
11 you listened to all the recordings that you  
12 provided, that are attributed to this  
13 document, 576 and 577?  
14 A For the most part, yes. Yes.  
15 Q All of them?  
16 A Yes.  
17 Q Okay. What is number 7?  
18 A Number 7 is a conversation in which Police  
19 Chief Jim Craft summoned Scott Poiencot to  
20 his office, and he expressed some concerns  
21 that Bert Bejsovec had came in and said that  
22 after I filed the complaint for payroll  
23 fraud, he felt that he wasn't going to get a  
24 fair shake. Because he passed one day going  
25 down the hall to his office, and he saw Gabe

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1 according to Scott Poiencot, that no,  
2 everything is fair and above board, that  
3 Scott has always been fair. He has always  
4 been professional. And that he has --  
5 Q Let me do this. I am going to cut you off.  
6 A Uh-huh (yes).  
7 Q I don't need you to tell me what's on it, we  
8 can all listen to it. You weren't a party to  
9 it. Is that fair?  
10 A (No response.)  
11 Q I mean, your interpretation of what it  
12 says -- (Interrupted)  
13 A But there's some relevant information in that  
14 recording --  
15 Q Okay.  
16 A -- that I need to discuss.  
17 Q Well, tell me.  
18 A Okay. And that he know that those guys on  
19 the third floor, and excuse my French, is  
20 knocking his dick in the dirt, and that  
21 everybody's telling him that he needs to  
22 transfer him. But as long as they're doing  
23 what they're supposed to, that that he's not  
24 going to transfer them. And he said, I know  
25 the issue came up about who leaked that

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1 information about the payroll fraud to the  
2 media. And once it was disclosed to the  
3 media, CAO Dee Stanley, called Chuck Huebner  
4 and asked him, why are you covering that type  
5 of story? And he said, well, it's news. And  
6 he said, well, how would you like if I say  
7 you're a child molester? And then, he said,  
8 well, who -- the question came up, who  
9 provided the information? And Chuck Huebner  
10 said, I met with Greg Cormier and he gave it.  
11 And he said, that's the same guy that gave me  
12 the information with Glen Dartez. And that's  
13 the furthest from the truth.  
14 Q All right.  
15 A So -- and again, Chief Craft is saying it  
16 there, I am responsible for Glen Dartez.  
17 Q Did you give anyone with the media anything  
18 having to do with the payroll fraud  
19 complaint?  
20 A No, sir.  
21 Q Did you go to Chuck Huebner?  
22 A No, sir.  
23 Q Have you ever gone to the media with  
24 anything?  
25 A No, sir.

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1 first.  
2 A I'm sorry.  
3 Q All right. And you can explain it.  
4 A Uh-huh (yes).  
5 Q I think I've been fair to you in letting you  
6 explain everything you wanted.  
7 A Go ahead.  
8 Q That last statement in that description of  
9 number 8, is that the result of the letter of  
10 reprimand that you received?  
11 A That is correct.  
12 Q All right. Okay. Anything else about that  
13 recording?  
14 A Yes.  
15 Q Okay. Go ahead.  
16 A In that recording, Dwayne Prejean accused me  
17 of leaking information to the media.  
18 Q Did you deny it?  
19 A Hold on. As well as -- no, I take that back.  
20 Not to the media.  
21 Leaking document, or providing  
22 documentation to attorneys, which I denied.  
23 But he said he was -- when I questioned him  
24 where did he get that information, he said he  
25 got it from Greg Randall.

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1 Q And when I say "media", I'm talking about TV,  
2 radio, newspaper, internet.  
3 A No media outlet whatsoever.  
4 Q All right. The same thing with the Glen  
5 Dartez incident, the same question?  
6 A No, sir.  
7 Q All right. Number 8, Greg with Dwayne  
8 Prejean. I think we've already talked about  
9 that, right?  
10 A Yes. We talked about it, but we never talked  
11 about the contents of it.  
12 Q Okay. You made the recording?  
13 A I sure did.  
14 Q And you told me where you made it, three  
15 different offices.  
16 A That's correct.  
17 Q All right. The letter of reprimand is as a  
18 result of the last sentence in that  
19 description of number 8, that's your letter  
20 of reprimand?  
21 A The investigation was filed. It was Dwayne  
22 Prejean was a witness, as well as Keith  
23 Gremillion, that same afternoon after the  
24 heated discussion he and I had.  
25 Q All right. You've got to answer my question

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1 And at that time, I said, well, you're  
2 an Internal Affairs supervisor, you're the  
3 head of Internal Affairs. Start an  
4 investigation to see if it's me. I can tell  
5 you it's not.  
6 So he had information, according to him,  
7 in February. He failed to report it. Why is  
8 that? That's a violation of the general  
9 order.  
10 Q Have you ever leaked any documents to any  
11 attorneys?  
12 A I just told you. I answered that question  
13 already. No.  
14 Q All right. Anything else about number 8?  
15 A That's pretty much it.  
16 Q Okay. Anything else about any other  
17 recordings? Does that jog your memory as to  
18 whether you made any other recordings at any  
19 time, that you have not given to your  
20 attorney, who has, in turn, not given to us?  
21 I just want to make sure that we got  
22 everything.  
23 A As part of discovery or --  
24 Q Yes. Because we've asked for every recording  
25 that y'all have made.

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1 And so, can you tell me now that there's  
2 no other recordings out there?  
3 A That's not the question you were --  
4 Q Well, that's the question I'm asking you.  
5 A Is the question you're asking me, is there  
6 any other recordings out there? Or is the  
7 question you're asking me, are there  
8 recordings relevant to the interrogatories  
9 that you asked?  
10 Q Both. Are there any other recordings that  
11 you're responsible for making that are not  
12 contained in 576, 577, or GC-139?  
13 A Yes. There should be.  
14 Q All right. And where are they?  
15 A They should be with the Scott Poiencot audio  
16 files.  
17 Q Okay. Do you know specifically which ones?  
18 A Mr. Corry, there should be a recording of a  
19 conversation with myself, and Ray Domingue,  
20 and Rick Zeno. There should be -- I'm  
21 sorry.  
22 Q Slow down.  
23 A Okay.  
24 Q Those are two different recordings?  
25 A Which ones?

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1 reserve my right to come back and finish  
2 deposing him if I need to once you  
3 provide that.  
4 MR. SPRING:  
5 All right.  
6 MR. CORRY:  
7 Q Any others?  
8 A There should be one with Major Jackie Alfred,  
9 in which we had -- he had a conversation  
10 about transferring people because they were  
11 hiding, as opposed to their explanation for  
12 transferring people to make them better, well  
13 rounded, in which he referenced Dewitt  
14 Sheridan, who is a lieutenant, and retired  
15 Lieutenant Calvin Floyd. And he was going to  
16 transfer them because they were hiding and  
17 avoiding their duties as a lieutenant. So he  
18 was going to transfer them in order to place  
19 them under a captain to watch them.  
20 There's another recording of Major  
21 Alfred --  
22 MR. SPRING:  
23 This is one you made?  
24 THE WITNESS:  
25 Yes.

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1 Q The one with Ray Domingue and the one with  
2 Rick Zeno?  
3 A No, they both were present at the time.  
4 Q Okay. And when was that done?  
5 A I would have to refer to my documents, but  
6 there was -- there's two recordings. One was  
7 when I was summoned to Mr. Domingue's office  
8 to provide a statement in conjunction with  
9 the payroll fraud. The second one was when I  
10 requested an audio recording of my statement.  
11 And I recorded the conversation because there  
12 were some questions I wanted him to address.  
13 Q All right. Any others?  
14 A There's an audio recording of Ron Czajkowski  
15 and Bert Bejsovec.  
16 Q When was that done?  
17 A I can't give you an exact date. I can tell  
18 you it was -- the nature of the conversation  
19 was a meeting we had over separating their  
20 duties as a patrol support lieutenant, where  
21 it would be fair and equitable.  
22 Q You made the recording?  
23 A Yes, sir, I did.  
24 MR. CORRY:  
25 And Steve, I'm just going to

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1 MR. SPRING:  
2 Okay.  
3 A There's another recording of Major Alfred in  
4 which -- and I might be mistaken, it might be  
5 the same recording. But I know if it's not  
6 that same recording, I know it was the  
7 conversation with myself and Major Alfred,  
8 where he questioned me about the payroll  
9 issue with one of the guys in ATAC. And  
10 during that conversation, he received a phone  
11 call from Reginald Thomas, in which he was, I  
12 guess, conducting some type of investigation  
13 on Scott Poiencot to catch him conducting  
14 civil service business on the clock, in which  
15 he had solicited the help of Reginald Thomas  
16 to see if there was any policy, or procedure,  
17 or state law, in which Scott was violating.  
18 And Reginald Thomas said he sought the  
19 advice of the state examiner, and they told  
20 him no.  
21 Q Do you know if any matters were discussed,  
22 civil service matters were discussed with  
23 Scott while he was a board member before  
24 being presented to the board?  
25 A What do you mean?

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1 Q Did any officer go discuss with him their  
2 case, or on behalf of someone, prior to it  
3 coming before the board?  
4 A Not that I can recall. I know there was --  
5 Q Have you heard any recordings about that?  
6 A No, sir.  
7 I know there was -- you want to let me  
8 finish?  
9 Q Okay.  
10 A I know there was officers that would come up  
11 on the third floor, and that's where the  
12 third floor boys came from, from Chief Craft.  
13 They would come on the third floor to seek  
14 advice for an issue they were having with  
15 either myself or Gabe Thompson.  
16 And then, at some point in time, Scott  
17 Poiencot may be in the general vicinity. But  
18 as far as me hearing an officer sitting there  
19 and discuss an upcoming appeal, no, I never  
20 heard that.  
21 Q Okay. Was there any reason why you, and Gabe  
22 Thompson, and Scott Poiencot would be  
23 together in one office? Was there any  
24 official police business that was being  
25 discussed?

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1 A No, sir.  
2 Q Did Scott do any civil service work while he  
3 was on the clock for LPD, during working  
4 hours?  
5 A To my knowledge?  
6 Q Yes.  
7 A No, sir.  
8 Q You don't know?  
9 A I said, to my knowledge, I said no.  
10 Q Okay.  
11 A Now, if he's doing it, and I -- no, don't  
12 know.  
13 Q Okay.  
14 A But no, I wasn't aware of it.  
15 Q Do you have any other recordings that you  
16 recall making that we have not been  
17 provided?  
18 A You're asking me a hard question, Mr. Corry.  
19 I can't remember the exact number of  
20 recordings and the nature of the recordings.  
21 We're talking about in the excess of almost  
22 three years ago.  
23 I can remember the most relevant  
24 recordings off the top of my head. But to  
25 exactly remember, you know, that I recorded

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1 A Sometime cases, yes.  
2 Q Why would y'all -- the three of y'all be  
3 discussing cases?  
4 A Well, Scott Poiencot was the precinct  
5 investigator. At some point in time, he  
6 would discuss certain cases that he was  
7 assigned. He was aware that I was in the  
8 criminal investigation section for an  
9 extended period. And I had some background  
10 in criminal investigations, or  
11 investigations, particularly. And he knew  
12 Gabe Thompson was in there. And Gabe  
13 Thompson was the supervisor.  
14 Sometimes when we're on break, we  
15 discussed general things of the police  
16 department, as well as things outside the  
17 realm of the police department, so --  
18 Q Do you -- did you ever discuss any civil  
19 service matters with Scott before they became  
20 -- came to hearing?  
21 A No, sir. I had no interest in discussing any  
22 matters.  
23 Q Do you know if Scott discussed with any other  
24 board members, matters before they came  
25 before the board?

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1 25 recordings, and these would encompass all  
2 the recordings, I can't tell you.  
3 Q Okay. Well, we've asked for all of them in  
4 discovery, so -- (Interrupted)  
5 A I can tell you this, the recordings that I  
6 made, no matter if it's one, or 350, it was  
7 provided to Scott Poiencot.  
8 Q Okay. And did you conduct all of your  
9 recordings on one device?  
10 A Yes, sir.  
11 Q A pen?  
12 A Yes, sir.  
13 Q Where is that pen?  
14 A I don't know where the pen is. The last time  
15 I saw it was several years ago. It may be at  
16 my house. I don't know. It may be at the  
17 office.  
18 Q All right. Did it have a disc on it to take  
19 the recorded information out of it?  
20 A It had a separate disc.  
21 Q It did?  
22 A Yes, sir.  
23 Q So you could take the disc out?  
24 A The disc wasn't on the recording device.  
25 Q How did you get the information off the



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1 recording device onto a jump drive, or a CD,  
2 or something like that?  
3 A I never retrieved that information off the  
4 pen.  
5 Q You don't know?  
6 A It was someone else.  
7 Q Is the information you recorded still on the  
8 pen, or was it deleted?  
9 A I can't tell you that, Mr. Corry. And in the  
10 wake of all that hysteria with the unfair  
11 investigation and all of that that followed  
12 with the transfers, and administrative leave,  
13 and all of that, that wasn't my number one  
14 concern about the pen.  
15 MR. CORRY:  
16 Steve, I'm going to ask that the  
17 pen be produced.  
18 MR. SPRING:  
19 Where is the pen? Do you have the  
20 pen?  
21 A I don't know where the pen is. That's a good  
22 question. As far as I'm concerned, the last  
23 time I saw it was at --  
24 MR. SPRING:  
25 It's your pen, right?

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1 A Yes, sir. That is correct.  
2 Q And you did not publish any of the  
3 recordings?  
4 A That is correct.  
5 Q We're going to go through that, so if you  
6 want to wait. I'll make a note to come back  
7 and ask you that, follow that question up.  
8 And for the record, did you make any --  
9 record any conversations after General Order  
10 201.2? I guess you want to see the date of  
11 it?  
12 MR. SPRING:  
13 Did you say June?  
14 MR. CORRY:  
15 Q General Order 201.2. I don't remember the  
16 exact date.  
17 A (Witness examines his documents.)  
18 Actually, it wasn't a general order when  
19 it was disseminated. It was a special order.  
20 There was no number.  
21 When it became a general order, Mr.  
22 Corry, was after I was terminated. Because  
23 the special lawyer had in there that it was  
24 going to become a general order in the near  
25 future. That, I can roughly tell you that.

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1 A Yes. It was at home and --  
2 MR. CORRY:  
3 Okay. I've asked for it, so --  
4 MR. SPRING:  
5 Okay.  
6 A Well, I'm just making it known on the record,  
7 my wife may not know it's a pen, and she may  
8 have discarded it. So she may not know it's  
9 a recording device. Because to the naked  
10 eye, it looks like a stereotypical pen.  
11 MR. CORRY:  
12 Q I think Kane had one, too.  
13 A No, sir, he didn't.  
14 Q Did you make any recordings after General  
15 Order 201.2?  
16 A Let's see if I can find that, because I don't  
17 want to go on record and answer something  
18 that -- see, the way you have it, it's not --  
19 Q While you're looking for that, Greg. As I  
20 understand it, you gave all recordings to  
21 Scott and no one else. Is that accurate? Or  
22 I'm sorry. Or Norbert Myers?  
23 A I gave the pen, not the recording.  
24 Q Okay. You gave the pen to either Scott or  
25 Norbert Myers, and no one else?

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1 Now, June 4, 2012, is when the Special  
2 Order 12.1 came out on clandestine  
3 recordings.  
4 To answer your question, no, I didn't.  
5 Q Turn to the front of that binder, Greg, if  
6 you will. Number 1, 2 and 3, 4, 5 and 6 and  
7 7, 8, 9, 10 and 11, are the documents that  
8 we've provided to your attorney for you to  
9 answer. Do you recall seeing those?  
10 A (Witness examines documents.)  
11 Q You're going ahead. Did you answer the  
12 question? 1 through 11, you saw those  
13 requests? And then, the responses are 12  
14 through 21, the initial responses.  
15 A I don't recall looking at that. I recall you  
16 sent out interrogatories, but you specified  
17 exactly what you were looking for.  
18 Like number 2 through 12, you had  
19 information you were asking for.  
20 Q You don't recall seeing number 2 through  
21 12?  
22 A Yes.  
23 Q You do recall seeing it?  
24 A Yes.  
25 Q Okay. And then, your responses, your initial

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1 responses. And I know they've been  
2 supplemented a couple of times. Your initial  
3 responses were 12 through 22 -- 21. Is that  
4 accurate?  
5 A Yes.  
6 Q All right. And then, documents number 22  
7 through 25 are what?  
8 A This is a copy of the letter, 22, sent by the  
9 computer voice stress analyzer administered.  
10 The test results is number 23. And 24 is  
11 basically his written report.  
12 Q 24 and 25?  
13 A Yes.  
14 Q Okay. And then, 26, 27 -- or scratch that.  
15 26 is your acknowledgement of your  
16 letter of termination. Is that accurate?  
17 A Yes. That's what it says at the top.  
18 Q All right. You received the letter of  
19 discipline, number 27 through 29, through  
20 your attorney or from your attorney?  
21 A Correct.  
22 Q Okay. And that's the letter of discipline,  
23 where you were terminated for AD2012-007?  
24 A Yes. According to the letter, yes.  
25 Q I'm going to mark this since it's not part of

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1 testified that you took it out of the shift  
2 level file in its original form. Correct?  
3 A Yes.  
4 Q Okay. Do you remember the shift level file  
5 that it was taken out of by number?  
6 A Not by number, no, sir.  
7 Q And if we look at, it's marked as D-1, it's  
8 got Olita Magee's, it looks like her fax  
9 header on top. It says, April 5th, 2012.  
10 And at the bottom, it says, Exhibit A.  
11 Can you tell me what information was  
12 whited out of this document from its original  
13 form to the form that it's in in D-1?  
14 A Can I look at the form?  
15 Q Yes.  
16 A (Witness examines document.)  
17 Q And while you're looking at it, Greg, were  
18 you the one responsible for whiting it out?  
19 A I think I answered that question. I said  
20 yes.  
21 Q Okay.  
22 A Now, what was your question? You wanted to  
23 know what was whited out?  
24 Q Yes.  
25 A The SL number, as well as the complainant.

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1 your submission. I'll just do it as D-1,  
2 since we have Greg Cormier, GC, for all the  
3 documents that we're referring to.  
4 I'm going to let you take a look at  
5 that, what we marked as D-1.  
6 A (Witness examines document.)  
7 Q Have you ever seen that document before?  
8 MR. SPRING:  
9 Let me see.  
10 A Yes, I have.  
11 MR. CORRY:  
12 Q When was the first time that you saw it?  
13 A In the statement I provided Dwayne Prejean,  
14 he showed me the document.  
15 Q Are you responsible for obtaining this  
16 document out of the shift level investigation  
17 that it was contained in, in its original  
18 form?  
19 A Yes.  
20 Q Without giving a name, do you know the shift  
21 level number that it pertained to?  
22 A No, sir, because it's not on there.  
23 Q All right.  
24 A Keith Gremillion can tell you that question.  
25 Q Well, you took it -- I think you just

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1 Q And what are you comparing Exhibit D-1 to?  
2 A Internal Affairs SOP. This is where the  
3 document was generated from.  
4 Q Okay. Is that Internal Affairs SOP part of  
5 the submission that's in the binder?  
6 A Yes.  
7 Q What number is it?  
8 A You're talking about the binder you got?  
9 Q Yes.  
10 A I don't know. That's another document that's  
11 not in here. This came out of my binder.  
12 See the holes that's punched in it?  
13 Q But you did not see it in the binder --  
14 A No, sir.  
15 Q -- in the documents that you provided to us?  
16 A No, sir.  
17 Q Okay.  
18 A But wait. Hold up. Hold up.  
19 MS. COREIL:  
20 Does that have a number on it? SOP  
21 number something or other?  
22 A No.  
23 MR. CORRY:  
24 He pulled that out of his binder.  
25 A No, that came out of my binder. So there

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1 wouldn't be any number.  
2 MS. COREIL:  
3 I mean --  
4 MR. SPRING:  
5 Can we take ten when you finish?  
6 MR. CORRY:  
7 Yes.  
8 MS. COREIL:  
9 I mean, like a general order, if  
10 you had a general order number  
11 whatever.  
12 A It's in Internal Affairs SOP, standard order  
13 procedure.  
14 MR. CORRY:  
15 We can take, Steve, if you want to  
16 take ten minutes while he's looking for  
17 that, that'll be fine.  
18 MR. SPRING:  
19 Yes.  
20 MR. CORRY:  
21 Greg, if you need to take a break.  
22 A That's it right here (indicating).  
23 MR. CORRY:  
24 Q Okay. Good.  
25 And what number?

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1 has --  
2 MR. SPRING:  
3 And bring it back tomorrow.  
4 MR. CORRY:  
5 -- and bring it back tomorrow.  
6 We have documents 1 through 577.  
7 And, you know, if there's 593, then  
8 provide us the rest.  
9 THE WITNESS:  
10 All right.  
11 MR. SPRING:  
12 Let's do that. That's your  
13 homework for tonight.  
14 MR. CORRY:  
15 Just take this with you and bring  
16 it back in the morning.  
17 THE WITNESS:  
18 Okay.  
19 MR. CORRY:  
20 And what you might want to do is if  
21 there's something that we don't have,  
22 segregate it out, and I will have my  
23 office -- Steve, with your permission,  
24 if he gets here --  
25 MR. SPRING:

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1 A It's GC-505.  
2 Q Okay. Good.  
3 MR. CORRY:  
4 All right. We can take ten. You  
5 need to take a break, Greg.  
6 (SHORT BREAK TAKEN IN DEPOSITION  
7 AT 3:35 P.M.)  
8 MR. CORRY:  
9 Steve wants to take a break now,  
10 and we'll come back and finish at 9:30.  
11 And that's not a problem for you to come  
12 back, Mr. Cormier?  
13 THE WITNESS:  
14 No, sir.  
15 MR. SPRING:  
16 All right. I appreciate that.  
17 MR. CORRY:  
18 Look, I actually don't have a  
19 problem, Steve, because this is all  
20 Bates stamped, with Mr. Cormier taking  
21 the copy that we have made --  
22 MR. SPRING:  
23 And compare them with the book?  
24 MR. CORRY:  
25 -- and comparing them with what he

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1 That's fine. I have no problem.  
2 MR. CORRY:  
3 -- at 9:00, he can give me that  
4 stack, and we can run it through the  
5 Bate's Stamp and add it to the end.  
6 MR. SPRING:  
7 That's fine.  
8 MR. CORRY:  
9 Mr. Cormier, is that good with you?  
10 THE WITNESS:  
11 That's fine.  
12 MR. CORRY:  
13 Okay.  
14 MR. SPRING:  
15 All right. I appreciate it.  
16 (DEPOSITION RECESSED AT 3:49 P.M.  
17 UNTIL TUESDAY, 9:30 A.M.)  
18  
19  
20  
21  
22  
23  
24  
25

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1 (DEPOSITION RESUMES ON THE  
2 1ST DAY OF APRIL, 2014,  
3 BEGINNING AT 9:49 A.M.)  
4 GREG CORMIER,  
5 after being first duly sworn, was examined and  
6 testified as follows:  
7 THE WITNESS:  
8 I do.  
9 EXAMINATION (4/1/14)  
10 MR. CORRY:  
11 Q Greg, we're starting back.  
12 Were you able to compare your binder to  
13 the binder that we had?  
14 A Yes.  
15 Q Did you find any additional documents that  
16 were not included in the production that you  
17 provided to us?  
18 A Yes.  
19 Q Okay. This is it?  
20 A Yes.  
21 Q Do you know how many pages this is?  
22 A No.  
23 MS. COREIL:  
24 Does that stack include the stuff  
25 that we got yesterday?

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1 taking out of a shift level file.  
2 In looking back at your termination  
3 letter, the -- I think you told me yesterday  
4 you didn't recall the shift level number that  
5 the file was taken out of?  
6 A That's correct.  
7 Q The file number.  
8 A That's correct.  
9 Q Looking at the termination letter dated  
10 September 12th of '12, it references SL  
11 2011-028. Does that refresh your memory?  
12 A No, because it's not on here.  
13 Q Okay. When you took the original, though,  
14 before you made the Wite-Out changes, was  
15 there a reference to 2011-028?  
16 A I can't remember that, Mr. Corry. That's  
17 awhile back.  
18 Q Okay. Were you in charge of 2011-028? Were  
19 you the officer assigned in charge of that  
20 investigation?  
21 A Which one is it?  
22 Q SL 2011-028.  
23 A You're going to have to give me a little bit  
24 more information.  
25 Q I think it involves JD, as we referenced

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1 MR. CORRY:  
2 It looks like it, yes. I see the  
3 --  
4 A Some of it, but there's some that's not in  
5 there.  
6 MR. CORRY:  
7 Why don't we do this? Hallie, I'll  
8 start. We'll count it, and then she'll  
9 copy it, and we can add it to the --  
10 MS. COREIL:  
11 Bates stamp it?  
12 MR. CORRY:  
13 We'll Bates stamp it and add it.  
14 At a break, we can do that.  
15 Why don't you count it here, so we  
16 know how many pages there are?  
17 MS. COREIL:  
18 Okay.  
19 MR. CORRY:  
20 Q Okay. Let's start back where we were.  
21 Greg, when we broke yesterday, we were  
22 talking about an exhibit which we've attached  
23 as D-1, which is noted to be a Lafayette  
24 Police Department interoffice communication  
25 SL Notice/Instructions, that you admitted

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1 yesterday.  
2 A Yes.  
3 Q Okay. Is that the file you took this  
4 document out of?  
5 A Yes.  
6 Q Did anyone, any superior officer at the  
7 Lafayette Police Department authorize you to  
8 take that document out of the file?  
9 A I didn't take the document out the file. I  
10 copied the document. The document still  
11 remained in the file.  
12 Q Okay. Did anybody authorize you to make a  
13 copy of that document?  
14 A No.  
15 Q Did you discuss making a copy of that  
16 document with anyone?  
17 A Scott Poiencot.  
18 Q And when was that discussion?  
19 A I can't give you an exact date.  
20 Q Okay. Can you give me a reference as to how  
21 it came up, the discussion between you and  
22 Scott, and that document, and the need for  
23 you to copy it?  
24 A Yes, I sure can. It was after a hearing with  
25 Ed Mclean in which the discussion came up.



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1 You should be familiar with that, Mr. Corry,  
2 you represented the city. It was over the  
3 60-day rule. He had mentioned that board  
4 president, Civil Board President Jason  
5 Boudreaux, had some issue with the  
6 investigation. And he had determined that  
7 they had violated the police officer bill of  
8 rights, Louisiana Revised Statute 40:2531, in  
9 which they had went over the 60-day time  
10 limit. And he had determined that either  
11 would be 62 days or 63 days, and he had  
12 factored in meeting out discipline.

13 There was an argument with -- over a  
14 policy that the Lafayette City Police  
15 Department had, that compelled them to  
16 complete an investigation within the 60-day  
17 parameter. And which Chief Craft testified  
18 and said he didn't, which he lied.

19 Ray Domingue, Human Resource Director,  
20 got up and testified, and lied, and said that  
21 they didn't, as well as Gail Smith.

22 When I was having a discussion with  
23 Scott Poiencot, I told him, you ought to be  
24 aware -- I don't know if you're aware of  
25 this, there is a policy or an SOP that

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1 A It would have to have been the meeting in  
2 which y'all asked to prepare a brief. And I  
3 can't give you the date. I can tell you that  
4 your clients went in there and testified  
5 under oath, and made a false statement, and  
6 nothing was addressed about that.

7 Q So you don't remember which one it was? It  
8 was just the one dealing with the 60-day  
9 rule?

10 A That would be the meeting. Because on March  
11 8th, you deposed Keith Gremillion, in which  
12 he conducted an unauthorized investigation  
13 into trying to find out where this document  
14 came from. So it would have to be the  
15 meeting prior to that. Now, I can't give you  
16 the exact month.

17 Q You don't know the date?

18 A I think I answered that already, Mr. Corry.  
19 I said I didn't know.

20 Q Okay. Do you know the outcome of the Mclean  
21 matter?

22 A Yesterday, I answered that. I told you no.

23 Q Okay. Well, would it surprise you if I told  
24 you that the board voted in favor of the  
25 appointing authority, and upheld the

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1 compels them to do it. And I don't know if  
2 that's going to be an issue.

3 Later on, unbeknown to me, Major Ted  
4 Vincent had the same discussion. So  
5 apparently that was being discussed around  
6 the police department. So it wasn't  
7 something of a confidential nature. And  
8 being that Captain Ted Vincent, who is now a  
9 major, spent extensive time in Internal  
10 Affairs section, he approached Scott  
11 Poiencot, also, and discussed this same  
12 document with him, and also, the 60-day rule.

13 Q Did Scott come to you or you went to Scott --

14 A We met in the hallway.

15 Q -- about this document?

16 A No, it wasn't about a document. It was about  
17 a discussion.

18 Q Okay. And we went over there on Mclean, on  
19 several occasions. There were several  
20 discussions before the board, and it was  
21 ultimately tried.

22 Do you recall which meeting of the  
23 Lafayette Civil Service Board, on which you  
24 just told me -- do you remember which time it  
25 was that we went over there.

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1 termination of Mr. Mclean, and found that the  
2 chief acted in good faith and for cause, and  
3 that the 60-day rule was not violated? You  
4 didn't know that?

5 A It wouldn't have mattered to me, Mr. Corry,  
6 one way or the other. The issue was that  
7 there's general orders, as well as civil  
8 service rules, which is a terminable offense  
9 to testify under oath and make false  
10 statements, and --

11 Q Okay.

12 A Let me answer that question.

13 Q You've got to answer my question first. You  
14 didn't answer it.

15 A I did.

16 Q You didn't --

17 A Yes, I did.

18 Q No, you didn't.

19 MR. SPRING:

20 He asked you if you know what?

21 MR. CORRY:

22 Q The outcome was.

23 MR. SPRING:

24 Okay.

25 A I said I didn't know. I did say that.

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1 MR. CORRY:  
2 Q Go ahead. You can respond.  
3 A I said the issue here is, this document was  
4 produced.  
5 Now, the issue came up where it was  
6 alleged that I produced the document. But  
7 the last person that had his hands on it, as  
8 far as I was concerned, or I was told was Ted  
9 Vincent. But yet he was never investigated,  
10 none whatsoever. Which leads back to this  
11 being a fair and impartial investigation that  
12 was conducted by the police department. But  
13 the issue was, this document here, they said  
14 they never had it.  
15 They testified under oath, civil  
16 service, which is basically perjury, Chief  
17 Craft, who is a classified civil service  
18 employee, which is a terminable offense.  
19 Now, you was there, you allowed that to  
20 happen. Were you aware of that?  
21 Q I'm not under oath and I'm not answering  
22 questions today.  
23 A Okay. But -- but you had a client that made  
24 a false statement.  
25 Q We're going to be here until Saturday. If

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1 A No.  
2 Q Okay.  
3 A I'm not finished. But at the time this same  
4 document was discussed, it was the issue  
5 dealing with the 60-day rule, and the pending  
6 litigation that you just alluded to, going to  
7 the appellant -- I mean, to appeal to Judge  
8 Rubin wasn't an issue there. So at the time,  
9 it wasn't decided if it was upheld or not.  
10 Okay?  
11 Q The record speaks for itself, Mr. Cormier.  
12 A I'm just making note of that.  
13 Q That's fine.  
14 A At the time when that was being discussed.  
15 Q That's fine.  
16 Were you at that board meeting when the  
17 60-day rule was discussed, and you thought  
18 that you needed to go copy that document,  
19 D-1, out of the shift level file that you had  
20 worked?  
21 A No.  
22 Q How did you find out that that issue was  
23 discussed at that board meeting?  
24 A I just told you, Scott Poencot and I had a  
25 discussion about it.

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1 you answer my questions and you want to  
2 explain, that's fine. And I've given you  
3 every opportunity to explain. But if you  
4 want to just keep going on, and on, and on,  
5 unresponsive answers, I'm going to note that  
6 it's unresponsive to the question and we'll  
7 take it up with the Court.  
8 A Mr. Corry --  
9 Q That's what we'll do.  
10 A -- I answered the question.  
11 Q Okay.  
12 A Didn't I answer the question?  
13 Q Not initially.  
14 A Didn't I answer the question?  
15 Q Well, I'm asking the questions today. Are  
16 you through?  
17 A Yeah, I'm through now.  
18 Q All right. Do you know if the Mclean matter  
19 was appealed to the Fifteenth Judicial  
20 District Court, Judge Rubin's courtroom?  
21 A No.  
22 Q Okay. Do you know that Judge Rubin upheld  
23 the termination of Ed Mclean, and found that  
24 there was no violation of the 60-day rule?  
25 Do you know that?

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1 Q And was he sitting on the board at that time?  
2 A When?  
3 Q When he had the discussion with you.  
4 A Yes.  
5 Q He was the representative of the police  
6 department on the civil service board?  
7 A Yes.  
8 Q Did you know that he was sitting on that  
9 board in violation of Louisiana law?  
10 A What violation?  
11 MR. SPRING:  
12 I'm going to object to the  
13 question. It calls for a legal  
14 conclusion on his part. Subject to the  
15 objection, answer the question.  
16 A What violation?  
17 MR. CORRY:  
18 Q Did you know that he was sitting on the board  
19 in violation of Louisiana law?  
20 A No. And what violation?  
21 Q Do you know that there was a judgment granted  
22 removing him from the board for sitting on  
23 it, in violation of Louisiana law?  
24 MR. SPRING:  
25 Again, I'm going to object.

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1 MR. CORRY:  
2 That's fine.  
3 A No. And I'm going to expound on that.  
4 When you asked, posed that question to  
5 Uletom Hewitt, as well as Kane Marceaux, the  
6 issue was him living outside the parish.  
7 Scott Poiencot was on that board for about  
8 almost a year before y'all took exception to  
9 it when he started doing what was proper. I  
10 found that odd that y'all had an objection  
11 way after a year that he was presiding over  
12 the board.  
13 MR. CORRY:  
14 Q Mr. Cormier, what did Scott tell you on that  
15 initial meeting you had with him? You said  
16 it was in the hallway?  
17 A Yes.  
18 Q At the PD?  
19 A Yes, sir.  
20 Q 900 East University?  
21 A Yes. The white house.  
22 Q On the third floor?  
23 A Yes.  
24 Q Outside of your office or his?  
25 A The hallway would be outside of the office.

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1 A I don't know either one.  
2 Q All right. And what else did Mr. Poiencot  
3 tell you?  
4 A That's pretty much it.  
5 Q Did you have any affiliation with the Civil  
6 Service Board?  
7 A What do you mean by that question?  
8 Q I mean, did you work for them, were you  
9 appointed by them to do anything at that  
10 time?  
11 A No.  
12 Q Okay. What else did Mr. Poiencot say?  
13 A That was the extent of it.  
14 Q Okay. And what did you say to him?  
15 A What I just told you earlier, that I don't  
16 know if you're aware when they addressed the  
17 60-day rule. And I said there's an SOP that  
18 governs the police department to conduct an  
19 investigation within the 60-day parameter,  
20 inclusive of discipline.  
21 Q Okay. And who made the decision to go get  
22 this document, which we've marked as D-1, and  
23 make -- well, this is the copy, whited out?  
24 Who made the decision to go copy that  
25 document; you or Scott?

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1 His office is in close proximity to mine.  
2 Q Okay.  
3 A So it would be in between.  
4 Q Was it a predetermined, scheduled meeting, or  
5 you just happened to bump into him in the  
6 hall?  
7 A I said, I ran into him --  
8 Q Okay.  
9 A -- if my memory serves me correct.  
10 Q All right. And what did he say to you?  
11 A I asked him how the meeting went.  
12 Q And what did he say?  
13 A Okay.  
14 Q All right. And how did the 60-day issue come  
15 up?  
16 A He said it was continued, and there was an  
17 issue dealing with the 60-day rule. And he  
18 went in detail about it. And I said, well, I  
19 don't know if you're aware, and that's when  
20 the document came up.  
21 Q Do you know if the Mclean matter was a shift  
22 level investigation or an administrative  
23 level investigation?  
24 A I don't know either one.  
25 Q I'm sorry?

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1 A I told you earlier, I did.  
2 Q All right. And when in relation to the  
3 meeting with Scott did you decide to do that?  
4 A Afterwards.  
5 Q That day?  
6 A I said I couldn't give you an exact date.  
7 Q All right. Was it within a few days of that  
8 date?  
9 A I can't remember, Mr. Corry.  
10 Q All right. Where was that file located when  
11 you went to make the copy?  
12 A In my office.  
13 Q It was not -- where was the original file  
14 located?  
15 A In my office.  
16 Q Okay. Were you the custodian of Internal  
17 Affairs files?  
18 A No, sir. That would be, at the time,  
19 Sergeant Gremillion.  
20 Q How did the file that you made the copy out  
21 of -- why was it being kept in your office?  
22 A I was investigating the case.  
23 Q Had the case concluded?  
24 A I can't remember.  
25 Q All right. What are you supposed to do with

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1 the file after you finish your investigation?  
2 A The original file is turned in.  
3 Q To?  
4 A The supervisor.  
5 Q And who would that have been at the time?  
6 A Captain Ron Czajkowski.  
7 Q All right. Did you turn in the file to  
8 Captain Czajkowski prior to making the  
9 copy?  
10 A I can't remember that.  
11 Q Did you ever turn in the file that you had in  
12 your office on that investigation?  
13 A Yes. Because if I wouldn't have, there would  
14 be another investigation of failing to  
15 complete an investigation.  
16 Q All right. Is that the investigation that  
17 was not completed within the 60 days?  
18 A No, sir.  
19 Q It was a different one?  
20 A I can't remember.  
21 Q So it could have been that one?  
22 A Yeah, it could have been that one.  
23 Q All right.  
24 A I had two investigations with Jeremy. I  
25 mean, JD.

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1 copied that document?  
2 A No.  
3 Q Was anybody with you when you whited out the  
4 information?  
5 A No.  
6 Q What did you do with the original document  
7 that has the Wite-Out on it?  
8 A The original document is whited on.  
9 Q The original whited out document?  
10 A I gave to Scott Poiencot.  
11 Q Okay. So he had the original copy with the  
12 original Wite-Out?  
13 A No, sir.  
14 Q It wasn't a copy?  
15 A No.  
16 Q It was a copy of what you had done?  
17 A Yes.  
18 Q All right. What did you do with the original  
19 that has the Wite-Out on it?  
20 A The original didn't have Wite-Out.  
21 Q The original copy that you made to put the  
22 Wite-Out -- where you put the Wite-Out on it?  
23 A I just said, I gave it to Scott Poiencot.  
24 But the way you're phrasing your  
25 question, or posing your question, it doesn't

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1 Q After you made the copy of the document, what  
2 did you do with the copy? Took it back to  
3 your office?  
4 A I gave it to Scott Poiencot. I think I  
5 answered that already.  
6 Q Who put the Wite-Out on it, you or Scott?  
7 A I did.  
8 Q Okay. Where did you do that?  
9 A In my office.  
10 Q That's what I'm asking you. So you made the  
11 copy, took the copy back to your office and  
12 whited it out?  
13 A Repeat that question.  
14 Q You made the copy out of the shift level  
15 file, put the original back in, took the copy  
16 back to your office and whited out the  
17 information you told me yesterday that you  
18 whited out?  
19 A Yes.  
20 Q Okay. Did you do that at the same time you  
21 made the copy? The same day, the same time  
22 frame, walked from the copier back to your  
23 office, or was it done sometime later?  
24 A It was done the same time frame.  
25 Q Okay. Was anybody with you when you made the

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1 make any sense.  
2 Q Well, just tell me that.  
3 A I'm telling you that now.  
4 Q All right. And let's start back over to make  
5 sure we're clear.  
6 A Yes.  
7 Q D-1, in its original form, was copied?  
8 A Correct.  
9 Q D-1 in its original form, the copy that was  
10 made, you put Wite-Out on it, you whited out  
11 some information on the copy, correct?  
12 A Yes.  
13 Q All right. The document that has the  
14 Wite-Out on it, you gave that to Scott?  
15 A Correct.  
16 Q You did not make a copy of that document?  
17 A Of the Wite-Out document?  
18 Q Correct.  
19 A That's what you're asking me?  
20 Q Yes.  
21 A No, sir.  
22 Q All right. When did you give it to Scott?  
23 A I think I answered that already. I can't  
24 gave you an exact date of when I gave it to  
25 him.



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1 Q Would it have been the day you copied it, or  
2 you don't recall?  
3 A I don't recall.  
4 Q Did Scott, at any time, tell you the  
5 information y'all were discussing was pending  
6 before the board?  
7 A I can't answer that. It's been awhile, Mr.  
8 Corry.  
9 Q Were you ever consulted or contacted by  
10 anyone representing Mr. Ed Mclean to obtain  
11 the document?  
12 A No.  
13 Q Were you ever contacted by Ed Mclean to  
14 obtain the document?  
15 A No.  
16 Q Did Ed Mclean know that you and Scott had a  
17 discussion and you copied the document?  
18 A No.  
19 Q When you gave it to Scott, was anyone else  
20 present?  
21 A I answered that already. No.  
22 Q All right. Where did you give it to him?  
23 A In the hallway.  
24 Q All right. The same place that y'all met?  
25 A Yes, sir.

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1 it to Scott, when Ted Vincent got a copy? I  
2 mean, was it within a day or two, a few days,  
3 a few weeks, or do you have any idea?  
4 A It should have been around --  
5 Q The same time?  
6 A Yes.  
7 Q Do you know if there are any recordings  
8 between Scott and Ted regarding that  
9 document?  
10 A Yes.  
11 Q There are?  
12 A Yes.  
13 Q Who made it?  
14 A Scott.  
15 Q Have you heard it?  
16 A Yes.  
17 Q What do you recall being on that recording?  
18 A I recall on the recording, Scott being in his  
19 office, Ted knocks on the door and enters.  
20 They start talking about things going on in  
21 Internal Affairs, in which Ted was expressing  
22 his displeasure. And the current affairs  
23 director or head Internal Affairs, Dwayne  
24 Prejean, they had a discussion about this guy  
25 not being qualified to be in there based on

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1 Q And do you know what he did with it?  
2 A Exactly, no. I know later on down the line,  
3 Ted Vincent had it.  
4 Q All right. And do you know how Ted Vincent  
5 got it?  
6 A As far as I know, Scott Poiencot.  
7 Q Okay. And how do you know Ted Vincent had  
8 it?  
9 A Scott Poiencot said it.  
10 Q All right. Were you present when it was in  
11 the possession of Ted Vincent?  
12 A No.  
13 Q Do you know who was present when Scott  
14 Poiencot gave it to Ted Vincent?  
15 A As far as I know, Scott and Ted had a  
16 conversation, just those -- them two.  
17 Q Did Scott give him the document, or simply  
18 show it to him?  
19 A He said he gave it to him.  
20 Q All right. Do you know if Scott made any  
21 copies of that document before giving it to  
22 Ted Vincent?  
23 A No.  
24 Q Do you know, in relation to the time that you  
25 copied the document, whited it out and gave

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1 his history at the police department.  
2 And they basically discussed that it was  
3 some sort of deal that was garnered between  
4 Allyson Prejean, Dwayne's wife, and Chief  
5 Craft, in exchange for Allyson to stop  
6 representing the officers that was beating up  
7 Jim Craft. That's Ted Vincent words. That  
8 Dwayne would be transferred into Internal  
9 Affairs section.  
10 During the course of that, he talks  
11 about how Dwayne instruct his officers to lie  
12 to target officers that are being  
13 investigated. And when he became aware of  
14 that, he and Dwayne had a discussion  
15 concerning that, and Dwayne's response was,  
16 the supreme court says they can lie to  
17 officers.  
18 He also referenced an incident in  
19 which --  
20 Q I'm listening, keep going.  
21 A He also references an incident in which he  
22 was having a discussion with Dwayne, and at  
23 the time, communications supervisor, Brad  
24 Ridge, was assisting Dwayne in showing him  
25 how to navigate the computer, as far as

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1 listening in on other officers.  
2 And during the course of Brad  
3 demonstrating how to utilize this new device  
4 that was implemented on Dwayne's computer,  
5 they inadvertently keyed on a conversation in  
6 which a DPR officer was having with her  
7 boyfriend, in which they were having a heated  
8 discussion. And at the time --  
9 Q What is a DPR?  
10 A Deferred police reporter.  
11 At the time, he was upset over it. He  
12 didn't make Dwayne aware of it. But at the  
13 time, he told Scott Poiencot that that's  
14 illegal, and that they thought they had  
15 removed all of those devices in the wake of  
16 former Chief Randy Hundley, and that they  
17 were still listening in on people's private  
18 conversation without them knowing.  
19 He went on to say that Dwayne basically  
20 went in and all the hard work that he did in  
21 Internal Affairs, as far as bringing it up to  
22 be a reputable section that had some  
23 integrity, that it was tarnished in a matter  
24 of blinking of an eye, with Dwayne going in  
25 there.

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1 to do something. And that was the extent of  
2 it.  
3 Q Okay. So you didn't have any authorization  
4 by anyone to make a copy of that document; is  
5 that accurate?  
6 A No.  
7 Q It's not accurate, or it is accurate?  
8 A It is accurate.  
9 Q Okay. Have you ever filed a grievance?  
10 A You asked me that yesterday. No, sir.  
11 Q Okay. You didn't file a grievance over this  
12 60-day issue that you thought was an issue,  
13 you and Scott thought was an issue regarding  
14 Mclean? You didn't file any grievance on  
15 that. Is that accurate?  
16 A No.  
17 Q It's not accurate?  
18 A I didn't file a grievance.  
19 Let me finish before you cut me off, Mr.  
20 Corry. And I'm not finished. I'm going to  
21 expound on that.  
22 There's no point of filing a grievance.  
23 I said it yesterday. It's -- a grievance  
24 doesn't go anywhere. The CAO is going to  
25 agree with the chief every single time.

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1 Q Was there any discussion about this document?  
2 A I'm getting to that.  
3 During the course of that discussion,  
4 Ted had told Scott that, hey, I heard what  
5 happened in the Mclean hearing. I had a  
6 discussion with Jim Craft. So I don't know  
7 if, you know, an appeal is pending and you  
8 deem that confidential. But the chief of  
9 police should know better than anything to be  
10 discussing a pending matter with other  
11 employees. Which, he does it on a regular  
12 basis anyway. But he said he had a  
13 discussion with Jim and some other people.  
14 And he heard what happened in the Mclean  
15 hearing, and the issue of the 60-day rule  
16 came up.  
17 And he basically said, well, I don't  
18 know what they're going to do.  
19 And at the time, Scott produced this  
20 document and showed it to him. And gave it  
21 to him, and said -- and his exact words,  
22 well, if they have a document like this, then  
23 they're shooting themselves in the foot, and  
24 it's a mute point for them to argue if they  
25 have a policy or procedure that governs them

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1 Don't take my word for it, prove me  
2 wrong. But any grievance, he's going to  
3 agree with him. That was said by Richard  
4 Chappuis. He knows, it's common knowledge.  
5 Q Do you know -- and if I asked you this, I  
6 apologize. But you've talked a lot, and I  
7 just want to make sure it's clear for the  
8 record. Sometimes we have to go back to make  
9 sure things are clear for the record.  
10 Do you know if Scott gave Ted Vincent  
11 the original whited out version of D-1, or  
12 did he give him a copy?  
13 A I can't answer that question. I don't know  
14 if he gave him the original or a copy.  
15 Q All right.  
16 A I know he gave him a copy --  
17 Q Okay. Do you know?  
18 A -- that --  
19 Q Go ahead.  
20 A -- that came from me.  
21 Q All right. Do you know what Ted Vincent did  
22 with it?  
23 A No, sir.  
24 Q Okay. Other than giving your whited out  
25 original copy to Scott, you didn't give that

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1 document to anybody else, did you?  
2 A No.  
3 Q Do you know if Scott gave that document to  
4 anyone other than Ted Vincent?  
5 A I think you asked me that already. And my  
6 response was no.  
7 Q Do you know if Ted Vincent gave it to anybody  
8 else?  
9 A You just asked me that. And no, I don't  
10 know.  
11 Q You mentioned Greg Randell's name yesterday.  
12 And I don't recall in what context. Did he  
13 have something to do with this document?  
14 A According to Dwayne Prejean.  
15 Q Well, I mean, according to you, do you know  
16 if Greg Randell had anything to do with it?  
17 A No.  
18 Q Okay.  
19 A I just said, according to Dwayne Prejean and  
20 Allyson Prejean, Greg Randell was the one  
21 that released that document to Olita Magee.  
22 Greg Randell's name came up with Dwayne  
23 Prejean, when we got in the heated argument  
24 over him being upset with me looking at his  
25 vehicle, which when he got in the wreck. And

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1 them. I don't want that to happen, Mr.  
2 Corry.  
3 Q Well, I'm asking you where you got the  
4 information.  
5 A There were several people that said that.  
6 Q Who?  
7 A Dwayne Bertrand. Let's see who else?  
8 Q Dwayne Bertrand told you that Allyson Prejean  
9 said it was -- (Interrupted)  
10 A No. That -- I'm trying to think who told me  
11 that Dwayne Bertrand told them, because  
12 Dwayne is friends with Allyson and Dwayne  
13 Prejean.  
14 Q So what did Dwayne Bertrand say?  
15 A Dwayne Bertrand said that Allyson was saying  
16 that Greg Randell provided this document that  
17 we're discussing currently right now, Exhibit  
18 A, D-1, to Olita Magee.  
19 Q Anybody else? You said there were several  
20 people.  
21 A I'm trying --  
22 Q I'm sorry. Go ahead.  
23 A I'm trying to think of the other people.  
24 I can't remember the rest of them, Mr.  
25 Corry, because I was laughing about the whole

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1 he probably was impaired when that happened,  
2 because it's common knowledge everybody calls  
3 him the Otis Campbell of the police  
4 department.  
5 But he was upset for some reason. I  
6 passed, and that's how the argument started.  
7 And during the course of the argument, he  
8 mentioned Greg Randell told him that I was  
9 providing reports to attorneys.  
10 Q Greg Randell told Dwayne Prejean that you,  
11 Greg Cormier, were providing reports to  
12 attorneys?  
13 A Yes. Then, later on, I discovered lately,  
14 Allyson Prejean is saying Greg Randell is the  
15 one that gave this document to the media.  
16 Q Where did you get that information from?  
17 A Several people. I'm not going to provide the  
18 names because --  
19 Q I think you have to.  
20 A Hold on. Let me tell you why.  
21 Q All right.  
22 A Kane Marceaux gave a deposition February  
23 17th. From the information he provided in  
24 the deposition, there were some people that  
25 were transferred. They retaliated against

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1 thing. Because it really doesn't matter at  
2 this juncture. Because they conducted the  
3 investigation and it says Scott Poiencot and  
4 I provided that document. So I wasn't, you  
5 know, pretty much concerned about it.  
6 If I'm not mistaken, I think Andres  
7 Landor mentioned that, too. I got the  
8 information, if I'm not mistaken, from Mike  
9 Brown, maybe. But don't quote me on that.  
10 Q As you're sitting here today, do you know how  
11 Olita Magee got her hands on it?  
12 A You're going to have to ask that question to  
13 Olita Magee. And I'm going to answer it for  
14 you, because I know you answer first, and  
15 then expound on it.  
16 I don't know.  
17 Q Was there any discussion between you and  
18 Scott about Ed Mclean needs to see this  
19 document?  
20 A You asked me that already. No.  
21 The conversation was over the 60-day  
22 rule, and the violation of the police officer  
23 bill of rights minimum standard, as it's  
24 known in Title 33.  
25 Q Kane mentioned a name of somebody that he

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1 thought gave it to Olita Magee. Do you  
2 remember that?  
3 A Mr. Corry, that's about a month ago.  
4 Q Okay. That's a no?  
5 A And y'all were talking for a long time.  
6 No.  
7 Q I think you told me yesterday you had not  
8 given any recordings to any news outlet; is  
9 that accurate?  
10 A Yes.  
11 Q The description of this document in the  
12 60-day rule, as you perceived it to be a  
13 violation, was contained in your federal  
14 lawsuit. There were some allegations in  
15 there about that? Do you know?  
16 A I would have to go -- no, I don't know. I  
17 would have to go through the lawsuit.  
18 MR. CORRY:  
19 How many pages were there?  
20 MS. COREIL:  
21 I counted 104.  
22 MR. CORRY:  
23 104.  
24 MR. CORRY:  
25 Q Do you want to make sure that everything you

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1 Did you write down?  
2 MS. COREIL:  
3 I did write it down. 104.  
4 And just for clarification, you  
5 have a PAR form that has got like carbon  
6 copies.  
7 A Uh-huh (yes).  
8 MS. COREIL:  
9 I just made -- I counted that as  
10 one copy, but she made a copy of the  
11 front and the back. So that's in  
12 here.  
13 A Okay. Good.  
14 MR. CORRY:  
15 Q What? I was going to let you count.  
16 A I'm going to take your word for face value.  
17 Q Pardon?  
18 A I'm going to take your word for face value.  
19 Q Okay. I've given your lawyer a copy. If  
20 there's an issue, we can certainly address  
21 it. There shouldn't be.  
22 Other than discussing this with Scott,  
23 did you complain to any other supervisor that  
24 you thought Mclean -- that the 60-day rule  
25 was being violated?

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1 gave us is in there?  
2 A Well, it's kind of a little late for that,  
3 Mr. Corry.  
4 Q Pardon?  
5 A It's kind of late for that. I should have  
6 been assured that before you made the copies.  
7 Q Well, I assumed you knew what you gave me.  
8 A Well, you said prior to giving copies, we  
9 were going to count them before.  
10 Q I did.  
11 MR. CORRY:  
12 Did you count them?  
13 MS. COREIL:  
14 Yes.  
15 MR. CORRY:  
16 And there was how many?  
17 MS. COREIL:  
18 There's 104.  
19 A I didn't hear an official count prior to you  
20 walking out.  
21 MR. CORRY:  
22 Did you tell us how many there  
23 were?  
24 A No, sir.  
25 MR. CORRY:

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1 A That's about two years ago, Mr. Corry. I  
2 can't tell you yes or no.  
3 Q I know it's in your stack of documents, but  
4 just to make it easy, for purposes of our  
5 discussion, I'm going to show you what I'll  
6 mark as D-2. It's a memo dated May 11th,  
7 2012, to you, where you were placed on  
8 administrative leave for AD-2012-007. Did  
9 you receive a copy of that?  
10 A It's not for administrative leave.  
11 Q What's it for?  
12 A Notice of investigation for AD-2012-007, I  
13 think.  
14 Q Were you later on put on administrative  
15 leave?  
16 A Yes.  
17 Q When, in relation to May 11th, 2012?  
18 A In August.  
19 Q Okay.  
20 MR. CORRY:  
21 I'll attach that as D-2.  
22 MR. CORRY:  
23 Q Do you remember the date that you were put on  
24 administrative leave?  
25 A I'd have to refer to my binder.



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1 Q We'll get to it.  
2 You had a predetermination hearing, I  
3 think, on September 7th of 2012.  
4 A Correct.  
5 Q And your two attorneys were present? Mr.  
6 Alexander and Mr. Spring were present for  
7 that?  
8 A Yes.  
9 Q You also gave a statement, I think it's  
10 GC-373, if you want to look at. If you want  
11 to look here at 373.  
12 A (Witness examines document.)  
13 Q Greg, you see Exhibit 373?  
14 A Yes.  
15 Q That's the statement that you gave in  
16 connection with this investigation. I think  
17 you had your attorneys present with you.  
18 A Yes.  
19 Q Okay. And then, 370 is where you were  
20 notified of the predisciplinary hearing.  
21 That's your signature on 370?  
22 A Yes, sir.  
23 Q And then, ultimately, you received -- and you  
24 have it in your submissions at several  
25 places. GC-27, that's the letter of

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1 Q That's a 17-page statement that you gave in  
2 connection with the investigation of Major  
3 Glen Dartez, under AD-2010-012?  
4 A Yes.  
5 Q Up until today, have you ever had a  
6 discussion with Ed Mclean about that  
7 document?  
8 A You asked me that already, Mr. Corry. No.  
9 Q And what about Olita Magee, up through today?  
10 A I responded already. No.  
11 Q Okay.  
12 MR. SPRING:  
13 Can I ask you, is that GC-238, or  
14 we're talking about the other one, D-1?  
15 MR. CORRY:  
16 No. I was talking about D-1.  
17 MR. SPRING:  
18 Okay. All right. I'm sorry.  
19 MR. CORRY:  
20 Q Let's talk about the number of times you were  
21 transferred in your 22-year career. Do you  
22 know how many times you were transferred?  
23 A No, sir.  
24 Q Was it more than five times?  
25 A Yes.

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1 determination dated September 12th, 2012?  
2 A (Witness examines documents.)  
3 Yes.  
4 Q Okay. I think you told me yesterday it was  
5 provided to you through your attorneys. It  
6 was sent to your attorney and he provided a  
7 copy to you. Is that accurate?  
8 A Yes.  
9 Q Okay. We've referenced it in the exhibits.  
10 MR. CORRY:  
11 I'm going to mark it as D-3 and  
12 attach it, with the acknowledgement,  
13 four pages.  
14 MR. SPRING:  
15 Is that his termination?  
16 MR. CORRY:  
17 Yes. September 12th of 2012.  
18 MR. CORRY:  
19 Q I want to go back to something on the Dartez  
20 matter. Turn to GC-238, if you would,  
21 please.  
22 A (Witness complies.)  
23 Q Do you see that? Do you see that there,  
24 Greg?  
25 A Yes. Hold on one second. Yes, sir.

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1 Q Was it more than ten?  
2 (INTERRUPTION IN DEPOSITION)  
3 MR. CORRY:  
4 Q Do you need to get that?  
5 A No.  
6 I'm adding them.  
7 Q Okay.  
8 A I don't know if it's ten or not.  
9 Q Somewhere between five and ten, you think?  
10 A Maybe. I don't have my personnel file to be  
11 able to tell you. It should be in there.  
12 Q Let me show you, and we can mark this as D-4.  
13 This looks like a transfer on December 8th of  
14 2010. There's a number of officers noted on  
15 it. Do you have that in your binder?  
16 A Yes.  
17 MR. CORRY:  
18 What number is that?  
19 MS. COREIL:  
20 I think it's in the new  
21 documents.  
22 A It was given to you yesterday.  
23 MR. CORRY:  
24 Q Okay. It's in the new stack that you gave to  
25 us this morning?

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1 A But it was already in your binder.  
2 Q Was it?  
3 A Yes.  
4 Q GC --  
5 A (Witness examines his document.)  
6 Uh-uh (no). Not that one.  
7 Q Pardon?  
8 A I take that back. It wasn't.  
9 MS. COREIL:  
10 I mean, we have it in this stack.  
11 MR. CORRY:  
12 Q The stack you gave us this morning, did it  
13 include the four or five documents you gave  
14 us yesterday, or was that separate?  
15 A Separate.  
16 MS. COREIL:  
17 I thought you said they were in  
18 there. Okay. We'll have to add those  
19 in.  
20 MR. CORRY:  
21 We'll have to add those in at the  
22 end.  
23 MR. CORRY:  
24 Q Okay. For ease of purposes for this, I'm  
25 going to show you what I've marked as D-4,

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1 Q What is the A shift?  
2 A The A shift is a 100 shift.  
3 Q Okay. And what is 100?  
4 A Night shift.  
5 Q And what is the Charlie shift?  
6 A Charlie shift is the 300 shift, night  
7 shift.  
8 Q And how long did you remain in that position?  
9 A One day.  
10 Q And where were you transferred from there?  
11 A I don't know.  
12 Q What do you mean?  
13 A Like I told you yesterday, I was assigned to  
14 work cold cases. And later on, I guess when  
15 retired Captain Dwayne Arceneaux had an  
16 epiphany of all the things that were going on  
17 at the police department, he actually  
18 summoned me to his office prior to him  
19 retiring. And he basically ran down  
20 everything that was going on at the police  
21 department, and expressed his displeasure.  
22 But he said this document here, he  
23 thought I was responsible for it. And in  
24 order for him not to be exposed, since he  
25 thought I was responsible for it, he tried to

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1 and it looks like it's a four-page transfer  
2 document dated December 8th, 2010.  
3 A (Witness examines document.)  
4 Q Is that accurate, four pages?  
5 A Yes.  
6 Q What was the reason for that transfer? Where  
7 were you transferred from, and where were you  
8 transferred to?  
9 A You're asking me the reason why? They didn't  
10 give me a specific reason why I was  
11 transferred.  
12 Q Where were you transferred -- what was your  
13 position you were in before the transfer on  
14 December 8th of '10?  
15 A Criminal investigator supervisor.  
16 Q And how long had you been in that position?  
17 A Four and a half years, maybe five years.  
18 Q Okay. And where were you transferred to?  
19 A The power squad --  
20 Q Okay.  
21 A -- shift, AC rotation.  
22 Q I'm sorry. What rotation?  
23 A AC.  
24 Q What does that mean?  
25 A Shift alpha, shift Charlie.

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1 appease me by taking me away from the power  
2 squad. But his explanation for my transfer  
3 was because of the Glen Dartez ordeal.  
4 And when I asked him, where he got that  
5 from, he said he was in a meeting where Craft  
6 said that was my pay back.  
7 Q Okay. So --  
8 MR. CORRY:  
9 Hallie, I think this is part of  
10 what he gave us. Can you get the number  
11 on it? It's in the new stuff that we  
12 copied today.  
13 MS. COREIL:  
14 It's in the new stuff?  
15 A He also --  
16 MR. CORRY:  
17 Q Hold on.  
18 A Okay.  
19 Q So you worked cold cases for one day? Or you  
20 worked the power squad one day, then you  
21 started working cold cases in response to  
22 what Arceneaux told you?  
23 A When you --  
24 MS. COREIL:  
25 GC-590.

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1 MR. CORRY:  
2 Q Is that the same document, GC-590?  
3 A Yes.  
4 Q Okay. And let's take a time out, because  
5 it's not going to be clear for the record if  
6 you're going through your binder. You've  
7 provided us copies of everything you've done.  
8 So we've got to refer to these documents by  
9 their number.  
10 A Okay.  
11 Q So let me get these and put them in the  
12 binder. And then, we can make copies of  
13 those other documents.  
14 (SHORT BREAK TAKEN FROM  
15 10:42 A.M. 10:56 A.M.)  
16 MR. CORRY:  
17 So that we're clear and it makes it  
18 easy for all of us and we can get out of  
19 here, GC-578 through 682 are the  
20 documents that Mr. Cormier gave us this  
21 morning, after comparing the exhibit  
22 book that we had with all the documents  
23 that were previously provided, in  
24 comparison to his binder. And these are  
25 the documents consisting of 104 pages,

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1 Q We can dispute that until the cows come home  
2 because I got the binder, you looked through  
3 it yesterday and they weren't in there. We  
4 got them today.  
5 A Right. I'm just --  
6 Q So they weren't in there. That's why we have  
7 them. Because if we'd had had them, they'd  
8 have been in this white binder, and they  
9 weren't.  
10 A No, sir. We -- just like you said, we can  
11 debate.  
12 MR. SPRING:  
13 Stamped April 1st, subject to your  
14 qualification. Now, can we move on?  
15 MR. CORRY:  
16 Q Got it.  
17 And then, we've got --  
18 MS. COREIL:  
19 It should be 11 pages.  
20 MR. CORRY:  
21 Q -- GC-683 through GC-693, were the documents  
22 that you gave us yesterday. They have the  
23 Bates stamp on them, received today. Because  
24 when you run it through the Bates stamp,  
25 that's when it was. You gave them to us

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1 that he found were not contained within  
2 the binder.  
3 MR. CORRY:  
4 Q Accurate?  
5 A Let's me add to this. I know you have it  
6 stamped on there, April 1st. That is not a  
7 reflection of when it was actually given,  
8 correct?  
9 Q What is that? Where do you see that?  
10 A Down here (indicating).  
11 Q I think that's on your document.  
12 A No, sir. No, sir. Not at all.  
13 MS. COREIL:  
14 No. We put it on the Bates stamp  
15 so that you know what date we got it.  
16 MR. CORRY:  
17 Q Oh, yes. April 1st is when we received it  
18 today. These 104 documents are when we  
19 received them today.  
20 A No, sir. You originally received them -- I  
21 just want to make it known, that was  
22 inclusive of my binder when I handed it over  
23 to you for Hewitt's deposition.  
24 Q Okay.  
25 A Now --

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1 yesterday, March 1st, 2014. These are the  
2 remaining documents. So now we have  
3 everything. Accurate?  
4 A No. But --  
5 Q What don't we have?  
6 A You have everything, but it was initially  
7 given to you on the date. So, if --  
8 MR. SPRING:  
9 Right, we got that.  
10 A All right.  
11 MR. CORRY:  
12 Q And you got the hundred?  
13 MR. SPRING:  
14 Yes. Here you go.  
15 MR. CORRY:  
16 Did you pick up my copy?  
17 MS. COREIL:  
18 Of?  
19 MR. CORRY:  
20 The 104 documents.  
21 MS. COREIL:  
22 We put one in there and you put one  
23 in there (indicating).  
24 MR. CORRY:  
25 Well, I'll need a copy. No, I got

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1 it.  
2 MR. SPRING:  
3 That's ours.  
4 MS. COREIL:  
5 One is stuck at the bottom of that,  
6 because you put them all --  
7 MR. CORRY:  
8 Okay. This is it. All right.  
9 MR. CORRY:  
10 Q All right. Let's go through the book, Greg.  
11 If you would, turn to -- I think we got  
12 through GC -- yesterday, we got through  
13 GC-29. If you would turn to that, please.  
14 A (Witness complies.)  
15 Q That's your letter of termination that we  
16 talked about. And then, GC -- correct?  
17 A (Witness examines document.)  
18 Yes.  
19 Q All right. GC-30, what is the significance  
20 of that? Why have you provided that to us?  
21 A This is an allegation of miss -- employee  
22 misconduct complaint form. If you notice on  
23 the date, it's February 14th, 2012. The time  
24 of it, if you look at the top left-hand  
25 corner, number 1, 2/14/12 1600 hours. It was

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1 Okay. Are you on 30?  
2 Q Yes.  
3 A Okay. Like I said, the problem you have is,  
4 Keith Gremillion is a witness on this. Okay?  
5 Keith Gremillion is the custodian of Internal  
6 Affairs, he's the sergeant. He was never  
7 disciplined for that. He's supposed to  
8 assure that the 60 --  
9 Q Did you file a complaint? Go ahead.  
10 A Let me finish.  
11 The 60 days, I don't have to file a  
12 complaint. The chief is supposed to initiate  
13 that.  
14 First of all, according to SOP, there's  
15 supposed to be a 30-day status update. There  
16 was none ever given. The reason that one  
17 wasn't given? Because Keith Gremillion was  
18 under the impression that this investigation  
19 was being handled by Bert Bejsovec. When he  
20 came to me -- when Gabe Thompson was in my  
21 office inquiring about who was assigned to  
22 it, he wasn't aware that I was working it.  
23 He was still under the impression that Bert  
24 was working it. Therefore, he was inept in  
25 his duties, but yet, he was never

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1 on the heels of the heated argument with  
2 Dwayne Prejean and myself.  
3 I find it ironic after an argument with  
4 Dwayne Prejean, the complaint is lodged  
5 against me. Which goes back to, you have a  
6 disagreement, or you file complaints, or  
7 exercise your arbitrary process against the  
8 powers that be, or Craft's -- Police Chief  
9 Craft's favorite son, you're retaliated  
10 against.  
11 Q The reporting party is Major Randy Vincent?  
12 A Yes.  
13 Q And this involves the investigation that was  
14 not completed within 60 days?  
15 A That is correct.  
16 Q And that's the same investigation where you  
17 received a letter of reprimand?  
18 A Yes.  
19 Q And that's the same investigation that you  
20 did not appeal that letter of reprimand to  
21 the Civil Service Board, correct?  
22 A Yes.  
23 Q All right. 31, what is that? That has to do  
24 with that investigation of 30?  
25 A Let's go back to 30.

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1 disciplined.  
2 Q All right.  
3 A Which shows the despaired treatment.  
4 Q Did you make a -- did you file any complaints  
5 as a result of that, against anybody?  
6 A They said they didn't want to hear it.  
7 Q Did you file -- you've got to answer the  
8 question. Yes or no?  
9 A No. Yes. Yes.  
10 Q You did? Who did you file a complaint  
11 against?  
12 A It was a verbal complaint. They didn't want  
13 to take it.  
14 Q To who?  
15 A Captain Czajkowski.  
16 Q All right.  
17 A Who was our immediate supervisor.  
18 Q What's the highest rank that you've ever held  
19 at the Lafayette Police Department?  
20 A Lieutenant.  
21 Q And how long were you in that position?  
22 A Roughly a year.  
23 Q Okay. So you don't know what goes on in the  
24 chief's -- as -- the duties and  
25 responsibilities of the chief, or the major,



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1 or the captain, because those are all ranks  
2 above you that you've never held, correct?  
3 A No. You're incorrect in that statement.  
4 Q You've held those -- have you held -- answer  
5 my question, first.  
6 Have you ever held those ranks?  
7 A That's not the question you asked. It's a  
8 two-fold question you asked.  
9 I was trying to address the first one  
10 first before you cut me off. And then, you  
11 asked another one.  
12 Now, if you allow me to answer the first  
13 one, then I'll answer the second one.  
14 Q Go ahead.  
15 A Could you rephrase that question?  
16 MR. CORRY:  
17 Go ahead and read it, please.  
18 (COURT REPORTER READS BACK PREVIOUS QUESTION)  
19 MR. CORRY:  
20 Q That's a yes or no answer.  
21 A Yes.  
22 Q You do know, or you do not know?  
23 A With some of the decisions?  
24 Q Yes.  
25 A Yes, some.

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1 GC-32 through 40?  
2 A That document was given to me.  
3 Q By?  
4 A (Witness examines document.)  
5 Q Did you answer?  
6 A Not yet. I'm trying to look to see who  
7 prepared it, because that's the individual  
8 who gave it to me.  
9 Dwayne Prejean.  
10 Q And when was that given to you?  
11 A Somewhere -- I can't give you an exact date,  
12 but it was during that summertime when they  
13 were launching the operation.  
14 Q Sometime in the summer of 2008?  
15 A That is correct.  
16 Q Is this a proprietary document that should be  
17 kept confidential?  
18 A No.  
19 Q Did you get permission from anyone with the  
20 Lafayette Police Department to take this  
21 document out of the police department?  
22 A No. Because I didn't have to.  
23 Q And what is the significance of this  
24 document?  
25 A The significance of the document is how Chief

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1 Q Do you know what their duties are?  
2 A Yes.  
3 Q How?  
4 A There's general orders that delineates their  
5 duties.  
6 Q Okay. Anything else on 30?  
7 A No.  
8 Q 31 is where you were notified of the  
9 complaint that was filed, SL-2012-005. You  
10 signed off on it on February 23rd of 2012; is  
11 that accurate?  
12 A Which number?  
13 Q 31?  
14 A (Witness examines document.)  
15 Yes.  
16 Q Then, 32, is the Lafayette Police Department  
17 Operational Plan for Homeland -- for  
18 Operation Homestead, revised August 4th of  
19 2008. And it goes from GC-32 through -- how  
20 far does it go, 41?  
21 A You're asking me that question, Mr. Corry?  
22 Q Yes.  
23 A 40.  
24 Q 40. Okay.  
25 Where did you obtain this document,

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1 Craft targeted certain people in society that  
2 he deems are undesirable. That came exactly  
3 from his mouth in one of the briefings.  
4 Q Did you complain to anyone about this  
5 document?  
6 A Yes.  
7 Q Who?  
8 A At the time, it was Captain Arceneaux, as  
9 well as Dwayne Prejean, as the lieutenant.  
10 Q Who was the lieutenant?  
11 A Dwayne Prejean.  
12 Q Okay.  
13 A Will you let me finish why?  
14 Q Sure.  
15 A Or you asked that.  
16 Well, I was displeased in the way the  
17 operational plan was written. The way they  
18 instructed officers to conduct the operation  
19 was to go around the downtown area, pick up  
20 transients, transport them to Beaver Park,  
21 fingerprint them, swab them for DNA, and send  
22 them on their way.  
23 I had an issue with it because I said,  
24 we're tip-toeing on the gray area, this chalk  
25 line of violating some people's rights. It

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1 fell on deaf ears. And they basically told  
2 me, the best thing you know, keep your mouth  
3 shut and follow the orders.  
4 Q Did you follow the orders?  
5 A I didn't participate in it because I didn't  
6 want to be in violation of somebody, that if  
7 they would complain, I would have an issue  
8 down the line of civil litigation with one of  
9 the transients.  
10 Q Do you know if there was any civil litigation  
11 as a result of this?  
12 A No.  
13 Q You don't know, or there wasn't?  
14 A There wasn't.  
15 Q All right. GC-41 is what?  
16 A Officer Safety Bolo.  
17 Q I'm sorry?  
18 A An Officer Safety Bolo.  
19 Q Is this a confidential document?  
20 A No.  
21 Q Rhonda Huebner and Charles Huebner, who is  
22 that?  
23 A Rhonda Huebner is Chunk, or Charles, Chuck  
24 Huebner's wife.  
25 Q Chuck Huebner is the reporter with one of the

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1 input in the preparation of that document?  
2 A (Witness examines document.)  
3 In the preparation?  
4 Q Yes.  
5 A No.  
6 Q Did you complain to anyone -- and I'm  
7 bouncing around on you.  
8 Did you complain to anyone about GC-41?  
9 Did you complain to anyone about GC-41?  
10 A No.  
11 Q GC -- (Interrupted)  
12 A I'm not finished.  
13 Q Go ahead.  
14 A And the reason at that time, the climate of  
15 the police department was you better not  
16 complain, otherwise there would be reprisals.  
17 That was in the wake of Glen Dartez.  
18 And at the time, I was transferred  
19 because of Glen Dartez, so I didn't want to  
20 take on more heat.  
21 Q And I think you've already -- go ahead and --  
22 that's it?  
23 A You cut me off.  
24 Q I didn't mean to.  
25 A I didn't want to take anymore heat by

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1 local TV stations?  
2 A That is correct.  
3 Q What is the significance of this being in  
4 your discovery responses?  
5 A According to Sean Arwood, Chief Craft  
6 instructed him to prepare this Officer's  
7 Safety Bolo to try to find something on Chuck  
8 Huebner, if they were ever dispatched to his  
9 residence, to embarrass him. Because he was  
10 returning the favor for Chuck Huebner  
11 embarrassing him for the Glen Dartez  
12 ordeal.  
13 Q Were you involved in this, in the preparation  
14 of 41?  
15 A I just said, Sean Arwood prepared it.  
16 Q Were you involved in its creation at all?  
17 A No, sir.  
18 Q So it's just something that Sean Arwood gave  
19 to you?  
20 A No. It was disseminated via the e-mail.  
21 Q To the entire police department?  
22 A That is correct.  
23 Q All right. Did you have anything to do --  
24 and I may have asked you, if I did, I'm sorry  
25 -- with GC-32 through 40? Did you have any

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1 complaining because that's what would have  
2 happened.  
3 It's known, if you complain, especially  
4 for a document that was instructed by the  
5 chief to prepare to someone. So basically,  
6 in essence, you're complaining on the chief.  
7 And there's reprisals when you do that.  
8 Q Did -- GC-42 is a clip of a newspaper  
9 article?  
10 A That's correct.  
11 Q And how do we know that it's 11/20/99, as  
12 handwritten on the side?  
13 A It's been awhile, Mr. Corry. I can't give  
14 you an explanation of why it's written right  
15 here.  
16 Q Where did you get this?  
17 A I would suspect the public library.  
18 Q Okay. Were you employed with the Lafayette  
19 Police Department in 1999?  
20 A Yes.  
21 Q What was your position?  
22 A I was in investigations.  
23 Q Did you work for Corporal Dwayne Prejean, or  
24 with Corporal Dwayne Prejean at that time?  
25 A With him?

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1 Q Yes.

2 A I'm trying to remember, because I'm trying to

3 remember where he was. I don't know if he

4 was in Metro Narcotics at the time, or if he

5 was in crime scene.

6 I know there was an incident when he was

7 in Metro Narcotics, in which he was battered

8 by a street level drug dealer when he picked

9 up a local prostitute in the four corners

10 area in exchange for sexual favors.

11 MR. CORRY:

12 No, no, no. Steve, hold on a

13 minute.

14 A I'm trying to figure out --

15 MR. CORRY:

16 I let him go for a day and a half.

17 He's not being responsive to the

18 question.

19 Dwayne Prejean is not a defendant

20 in this lawsuit. He's talking about

21 things -- because he's been dismissed,

22 he's talking about things, about

23 individuals that are not involved in

24 this. We've had these matters before

25 the judge before. So, you know, if he

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1 Q Correct.

2 A Okay. And my --

3 Q What does a battery and prostitution have to

4 do with that?

5 A Hold on, Mr. Corry.

6 Q What does that have to do with that?

7 A Will you let me explain?

8 Q That's a yes or no question.

9 Did you work with him? That's it. That

10 was the question.

11 A And my response was, I don't know at that

12 time.

13 Q Okay. That's fair. You don't know.

14 A And when --

15 Q Got you.

16 A And when I said, I didn't know, I was

17 elaborating on why I said I didn't know.

18 Q I didn't ask you why you didn't know, I just

19 asked you if you knew. If you worked with

20 him yes or no. That's it.

21 Did you work with him? Yes or no?

22 A Mr. Corry, hold on.

23 I don't mean to banter with you, but

24 there's been some responses where you didn't

25 ask me to elaborate. And initially, from the

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1 wants to keep going there, that's fine.

2 But I am going to take them up with the

3 Court if I have to.

4 So, you know, I want him to be

5 responsive to my questions. And my

6 question was a yes or no answer, and

7 he's launching into this, that has

8 really nothing to do with this lawsuit

9 at all.

10 So I don't know if y'all want to

11 discuss it, or how you want to address

12 it.

13 MR. SPRING:

14 I thought you asked him the

15 significance, and he's trying to explain

16 that.

17 A You asked me about Dwayne Prejean.

18 MR. CORRY:

19 Q No. I asked you if you worked with him

20 A And who --

21 Q That's all I asked, who did you work with?

22 A Hold on. What did you ask me, who I worked

23 with? Dwayne Prejean, correct?

24 Q I said, did you work with him?

25 A Dwayne Prejean, correct?

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1 onset of this deposition, you said, I'm going

2 to pose a question, once I finish the

3 question, answer yes or no. If it entails

4 some elaboration, then you elaborate.

5 Q I said, if you need to explain, feel free.

6 A Well, it's the same thing.

7 Q Okay.

8 A Correct?

9 Q I'm not under oath. I'm not answering

10 questions, I've told you that.

11 All right. GC-43 through 93, appears to

12 me to be the Lafayette Police Department

13 Internal Affairs section, standard operating

14 procedures.

15 Can you verify that that's what this is;

16 what this document is?

17 A (Witness examines document.)

18 Yes.

19 Q It is?

20 A (Witness nods affirmatively.)

21 Q Okay. Did you have --

22 MR. SPRING:

23 Answer affirmatively. He was just

24 shaking his head a lot.

25 MR. CORRY:

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1 Q You said yes?  
2 A Yes. I said yes. Did you say yes?  
3 Q Did you have authority to take this document  
4 out of the Lafayette Police Department?  
5 A Yes, it's -- you're not prohibited from  
6 taking it. It's not considered  
7 confidential.  
8 Q Okay. Have you ever worked in Internal  
9 Affairs?  
10 A No.  
11 Q How did you get a copy of this?  
12 A It's on the police server.  
13 Q Okay. And when did you obtain a copy of  
14 this?  
15 A I can't give you an exact date, Mr. Corry.  
16 Q Did you obtain a copy of GC-43 through 93, or  
17 did someone else on your behalf?  
18 A I did.  
19 Q And you don't know when?  
20 A No, sir.  
21 Q And why is this included in your discovery  
22 responses?  
23 A Because that infamous document, the  
24 confidential document that you referenced to,  
25 it's in Internal Affairs SOP, so --

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1 Internal Affairs.  
2 So when Chief Craft and the rest of them  
3 perjured themselves in civil service, they  
4 were aware that it's an SOP that he approves,  
5 that he signs off on.  
6 Q And the board found that the 60-day wasn't  
7 violated, which you didn't know, and the  
8 Fifteenth JDC affirmed the decision, which  
9 you didn't know, so -- (Interrupted)  
10 A That wasn't the issue.  
11 Q All right.  
12 A It's making that false statement, Mr.  
13 Corry.  
14 Q GC-94 is a general order, 301.10. Polygraph  
15 examination/computerized voice stress  
16 analysis. That's the general order that  
17 refers to that, correct?  
18 A Yes.  
19 Q Where is the second page?  
20 A That, I don't know. The second page should  
21 be the signature of the chief.  
22 Q All right. Were you given -- or did you give  
23 a polygraph in connection with 2012-007, the  
24 Mclean document?  
25 A Yes.

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1 Q What number is it?  
2 A GC-79.  
3 Q I didn't understand your explanation.  
4 A You asked me the significance of why I  
5 submitted the Internal Affairs SOP. And I  
6 said, the infamous document that you're  
7 referring to, Exhibit D-1 --  
8 Q Okay.  
9 A -- it's in Internal Affairs SOP.  
10 Q Okay. So your testimony is that D-1 is the  
11 same as GC-79?  
12 A With the exception of the Keith Gremillion  
13 signature.  
14 Q Okay. But D-1, as you've testified, was  
15 taken out of a shift level investigation? It  
16 was not taken from the Internal Affairs  
17 section, standard operating procedures, was  
18 it?  
19 A No.  
20 Q Okay.  
21 A I'm not finished.  
22 Q Go ahead.  
23 A I said it was the same, meaning that same  
24 document which instructs you to complete an  
25 investigation within the 60 days is in

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1 Q Did you pass it?  
2 A No. I was told I didn't.  
3 Q I'm sorry.  
4 A I was told I didn't.  
5 Q By who?  
6 A The polygraphist.  
7 Q Who is that?  
8 A Joey Provost.  
9 Q He told you you passed the polygraph?  
10 A I just said, I was told I didn't.  
11 Q Did not?  
12 A I didn't. Didn't means did not.  
13 Q Well, I couldn't understand you.  
14 A Okay.  
15 Q So Joey Provost told you that the polygraph  
16 you gave in connection with the Mclean  
17 document, you did not pass, correct?  
18 A Correct.  
19 Q And what is the significance of having the  
20 general order in here?  
21 A The significance of the general order, if you  
22 refer to section D-1, examination assistance  
23 to other law enforcement agencies, LCG  
24 Department. Polygraph and CVSA examinations  
25 may be conducted for the Lafayette



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1 Consolidated Government departments when  
2 authorized by the chief of police. It also  
3 says up in the top, that the chief of police  
4 is the only one that can authorize the CVSA  
5 or a polygraph. Dee Stanley authorized the  
6 polygraph.  
7 Q Dee Stanley is the CAO, right?  
8 A Yes.  
9 Q And it's your position he cannot authorize or  
10 order an investigation?  
11 A Not when it's the duties of the chief of  
12 police to order the administrative  
13 investigation.  
14 Q Well, he did in this case, didn't he?  
15 A Yes, and he was also the complainant.  
16 Q And you were also terminated as a result of  
17 that, correct?  
18 A Yes.  
19 Q So he did order the investigation, correct?  
20 A Yes.  
21 Q Okay.  
22 A But he went against policy and procedure.  
23 Q All right. GC-95 through 125 appears to be  
24 the Lafayette Police Department Seniority  
25 List, as of July 8th of 2010. Am I reading

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1 Q What did you release to the press?  
2 A Nothing.  
3 Q Do you know the outcome of that  
4 investigation?  
5 A No. But that investigation was intertwined  
6 in my termination letter for 2012 --  
7 AD-2012-007.  
8 Q Okay. What is it alleged that you released  
9 to the press?  
10 A The audio recording.  
11 Q Of what?  
12 A Conversation or meeting with Police Chief Jim  
13 Craft and several others.  
14 Q Who are the others?  
15 A Captain Randy Vincent, Lieutenant Dwayne  
16 Prejean, Captain Ron Czajkowski. That's all  
17 I can think of.  
18 Q When was that? Were you part of that  
19 recording?  
20 A Yes, sir.  
21 Q Did you record it?  
22 A Yes.  
23 Q And that is, I think we talked about it  
24 yesterday. That is the recording -- or maybe  
25 we didn't. I thought it was number 8 on

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1 that right, at the top of the page?  
2 A Yes.  
3 Q That is -- I am reading that correctly, that  
4 that's the seniority list as of that date?  
5 A Yes.  
6 Q Where did you get a copy of this?  
7 A The computer.  
8 Q Okay. That's something that's provided to  
9 all Lafayette Police Department personnel?  
10 A Yes.  
11 Q Is it accessible at any time?  
12 A I don't know now. I know it was when I was  
13 there.  
14 Q It's something you can look at?  
15 A Correct.  
16 Q And the reason you have this in your  
17 submission of discovery responses is simply  
18 to show where you rank?  
19 A That is correct.  
20 Q All right. GC-126, what is that?  
21 A (Witness examines document.)  
22 That's a second investigation -- notice  
23 of investigation.  
24 Q For what investigation?  
25 A Unauthorized press release.

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1 GC-577.  
2 Where is the reference to that recording  
3 you're referring to, that you just told me  
4 about?  
5 A The reference where?  
6 Q Do you have a reference to it anywhere?  
7 A As part of discovery?  
8 Q Yes.  
9 A No, sir. I don't think so.  
10 MR. CORRY:  
11 Steve, we've asked for all  
12 recordings. Now we're talking about one  
13 that we don't have.  
14 MR. SPRING:  
15 Is this the JD?  
16 A Yeah, he's talking about discovery. I didn't  
17 submit that with the interrogatories. You're  
18 talking about interrogatories, or are you  
19 talking about the whole entire discovery?  
20 MR. CORRY:  
21 Q We asked for copies of all recordings.  
22 MR. SPRING:  
23 That's on the website. That's the  
24 recording he's talking about.  
25 MR. CORRY:

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1 Q Well, that's what I'm asking you. Did you  
2 provide me with a copy of it? Pardon?  
3 A Yes.  
4 Q When?  
5 A I don't know. It should be on the Scott  
6 Poiencot's --  
7 Q Okay.  
8 A -- audio recording.  
9 Q So it's on Poiencot recordings, not yours?  
10 A Yes.  
11 Q But you -- (Interrupted)  
12 A I asked you -- I asked particularly about  
13 discovery dealing with my interrogatories.  
14 Q Okay.  
15 A Okay.  
16 Q Did you make this recording?  
17 A Yes.  
18 Q Was Scott present?  
19 A No.  
20 Q You gave the recording to Scott?  
21 A No.  
22 Q What did you do with it?  
23 A I gave him the pen.  
24 Q With the recording on it?  
25 A Yes.

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1 Q Yes.  
2 A No.  
3 Q Why did you give it to Scott?  
4 A Because he had the device to download the  
5 recording.  
6 Q Okay. Have you heard it since that day that  
7 you gave it to him?  
8 A Yes.  
9 Q When?  
10 A I heard part of it when -- I can't remember.  
11 I know I heard it.  
12 Q All right. What was the date of that  
13 recording?  
14 A I can't give you the exact date, Mr. Corry.  
15 Q And what was the nature of the recording? I  
16 don't want you to disclose a person's name if  
17 it involves a private personnel matter. But  
18 you can still give me the gist of what the  
19 recording entailed.  
20 A It was a discussion after I conducted an  
21 investigation on JD that was being supervised  
22 by Bert Bejsovec, in which at the conclusion  
23 of my investigation, I submitted the report  
24 through the chain.  
25 Prior to my completion of the

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1 Q And that recording ended up on the Real Cops  
2 versus Craft website?  
3 A I'm not sure if it was on that website. I  
4 was investigated for allegedly releasing it  
5 to Busted in Acadiana.  
6 Q So it was on the Busted in Acadiana  
7 website?  
8 A I would suspect. That's what they allege  
9 that I did.  
10 Q Did you tell anybody, or did you tell Scott  
11 when you gave him the pen of that recording,  
12 not to release it to anybody?  
13 A No. I didn't give him detailed instructions  
14 as far as what he should do or do not.  
15 Q Did he tell you what he was going to do with  
16 it?  
17 A No.  
18 Q Did it come as a surprise to you that it was  
19 on the Busted in Acadiana website?  
20 A Surprises me what?  
21 Q I mean, did you have the anticipation that  
22 the recording was going to be released to  
23 someone by Scott, or someone else?  
24 A Are you -- no. Are you asking me if someone  
25 forewarned me that it was going to come out?

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1 investigation, there was a formal dialogue  
2 between myself, the captain, the major, as  
3 well as the chief. There's some e-mails to  
4 verify that, which I was -- that was the  
5 purpose of me recording it, because they were  
6 concerned about that particular  
7 investigation, because other investigations,  
8 the chief never consulted with me about.  
9 He sent me an e-mail requesting to setup  
10 a meeting, because at the conclusion of the  
11 investigation, I had determined and suggested  
12 that the allegations were proven. And as  
13 well, there was some other officers during  
14 the course of conducting the investigation  
15 had lied, and that was an issue that needed  
16 to be addressed as well.  
17 Therefore, he requested a meeting to  
18 discuss this in further detail, which we all  
19 met, and -- well, prior to that, Captain  
20 Czajkowski and Dwayne Prejean, who was  
21 Internal Affairs head at the time requested a  
22 meeting with me prior to that. And we had a  
23 discussion about the investigation, and what  
24 direction the chief should take on it, as far  
25 as disciplining JD, as well as what he should

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1 do with the officers that lied.  
2 And as well as there was a summons  
3 issued to a bar owner, Brandon Hargrave, and  
4 which at that time, in the meeting, Dwayne  
5 Prejean basically said that the chief was  
6 upset because the guy was given a summons,  
7 and that he considered him a good friend,  
8 that he would go and drink all the time. So  
9 he was upset that I gave him a summons during  
10 the course of the investigation.  
11 And he suggested that these officers get  
12 some form of a remedial training. That was  
13 thrown around. And at the time, I said,  
14 well, that violation that was committed  
15 warrants more than just remedial training,  
16 because you lied and you failed to cooperate  
17 in an investigation, which is a terminable  
18 offense. If you look at the general order  
19 under the discipline area, it is.  
20 Anyway, later on, we had a meeting with  
21 the chief. That issue was discussed again.  
22 They talked about officers not being  
23 forthcoming, and lying in the investigation,  
24 in which Dwayne Prejean suggested that they  
25 receive remedial training because of their

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1 A He also touched upon the probable cause of  
2 the issuance of the misdemeanor summons, in  
3 which I told him that I was justified in  
4 issuing the summons. And Captain Czajkowski  
5 agreed with me. And then, later on, at  
6 the conclusion of the meeting, Captain  
7 Czajkowski met me upstairs. They had stayed  
8 downstairs maybe 20, 30 minutes. And when I  
9 say "they", the rest of the people present in  
10 the meeting. And I left. They excused me  
11 from the meeting.  
12 Captain Czajkowski came up and said that  
13 Chief Craft was upset with me because I had  
14 disagreed with him, and I wasn't a team  
15 player. He said, Greg, you know how he is.  
16 Just be careful, something may be coming down  
17 the pike.  
18 Q Did you complain about that to anybody?  
19 A No. But let me -- let me expound on that.  
20 There's no need for me to complain, Mr.  
21 Corry. Who am I going to complain on? If I  
22 file a grievance, it goes to Dee Stanley.  
23 He's going to agree with the chief.  
24 I can't go and complain on the chief for  
25 something he did. I can't go to human

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1 credibility, because they were all on SWAT.  
2 And I was baffled when he made that  
3 statement, because two weeks or -- I know  
4 there was a previous incident in which an  
5 officer was investigated. I'll be mindful  
6 you said not to divulge the name because he  
7 didn't appeal it. So I'll just use the  
8 initials, DM, in which it was alleged that he  
9 lied to someone. And he was a black officer.  
10 He received a five-day suspension.  
11 Q Let me ask you --  
12 A Go ahead.  
13 Q -- a question. Did the activity that you're  
14 referring to with these officers, involve on  
15 duty or off duty activities?  
16 A Off duty.  
17 Q Okay. Does it have anything to do with  
18 copying a confidential document and providing  
19 it to someone within the police department?  
20 I guess the answer to that's no, correct?  
21 A No.  
22 Q Okay. Anything else on that?  
23 A Will you let me finish, Mr. Corry?  
24 Q Yes. That's what I'm saying, is there  
25 anything else on that?

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1 resource, they give the round around.  
2 Q All right.  
3 A What recourse I had?  
4 Q All right. GC-127, that was where there was  
5 a typo in the initial memo that was sent to  
6 you? Is that what that refers to?  
7 A No, sir. That should be another -- you've  
8 got it disorganized. Okay.  
9 GC-128 should be in front of GC-127.  
10 Q Okay. It's self-explanatory, isn't it?  
11 A No, sir. I'll explain to you why. As well  
12 as GC-129 should be in front of 127.  
13 As a matter of fact, 128 and 129 should  
14 be -- 128 should be first, 129 should be  
15 second. And then, 127 should be following  
16 both, too.  
17 Q All right. Got it.  
18 A All right. I'll explain to you the relevance  
19 of that.  
20 Initially, I was served with a notice of  
21 investigation on May 15th, 2012. If you  
22 notice, you are hereby required to fully  
23 cooperate in the investigation, which shall  
24 include giving a statement, and may include a  
25 polygraph examination, if so directed by the

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1 chief of police. Which refers back to, he's  
2 the only one that can authorize a polygraph  
3 exam.  
4 But turn to 129. This is a second  
5 notice that was sent to us by Dwayne Prejean,  
6 who actually issued the first one. The  
7 second one was pretty much similar, with the  
8 exception, if you read down, you are required  
9 to cooperate fully with the investigation,  
10 and shall include giving a statement, which  
11 is in bold letters, and a polygraph  
12 examination, which is also in bold letters.  
13 Now, it's common practice, Mr. Corry,  
14 you give a statement -- when you're  
15 investigating any type of allegation of  
16 employee misconduct, or any criminal  
17 investigation, you get initial statement from  
18 the person. If you determine that there's  
19 some deception, then you request another  
20 interview, which is a CVSA or a polygraph.  
21 Automatically, I was required to give a  
22 polygraph, as well as provide a statement.  
23 Q And you gave them both, didn't you?  
24 A The relevance of it is --  
25 Q You've got to answer the question.

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1 A Let me finish. The reason I responded and  
2 said no is Forrest Blanton didn't receive a  
3 second notice, Nancy Hebert didn't receive a  
4 second notice, as well as Austin Provost.  
5 Q And how do you know that?  
6 A They told me.  
7 Q Do you have any documentation to support  
8 that?  
9 A Their verbal statement.  
10 Q That's not a document, is it?  
11 A (No response.)  
12 Q Is it?  
13 A No.  
14 Q Okay. And you never worked in the IA, I  
15 think you told me, Internal Affairs?  
16 A No.  
17 Q And 130, it looks like you're citing a  
18 statute.  
19 A Yes.  
20 Q Is that accurate?  
21 A Yes.  
22 Q What is the significance of that?  
23 A It shows his ineptness. He cited that  
24 statute was not applicable to the police  
25 officer bill of rights.

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1 A Yes.  
2 The relevance is automatically, I was  
3 targeted. And I was guilty.  
4 And this is by Dwayne Prejean, which is  
5 a conflict. He's the complainant in the  
6 investigation, and as well as he's  
7 investigating. Do you think I'm going to get  
8 a fair and impartial investigation? No.  
9 Q 127 is the e-mail that was sent, and the 2 is  
10 the various officers that it was sent to?  
11 A Which various officers?  
12 Q The e-mail at 127, there were multiple people  
13 identified as the e-mail being sent to. Is  
14 that accurate?  
15 A No, sir.  
16 Q It didn't go to these people, or do you know?  
17 127, I'm talking about?  
18 A 127. (Witness examines document.)  
19 No, sir.  
20 Q It didn't go to those people?  
21 A No, it didn't go to all of them. Not both  
22 forms.  
23 Q All right.  
24 A Let me --  
25 Q Let's look at -- (Interrupted)

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1 Q People make mistakes, don't they?  
2 A No, sir. You can't afford to make a mistake  
3 in Internal Affairs where you have officers'  
4 livelihood in the palm of your hands. No,  
5 sir.  
6 Q Have you ever made a mistake in your police  
7 work?  
8 A That's inexcusable.  
9 Q Have you ever made a mistake in your police  
10 work?  
11 A Not when -- yes, sir.  
12 Q That's a yes or no question.  
13 A Yes. But not when it concerns that.  
14 Q Have you ever made a mistake where someone  
15 was arrested?  
16 A No.  
17 Q All right. 131, that's an e-mail that was  
18 sent to you?  
19 A (Witness examines document.)  
20 Yes.  
21 Q Does that have anything to do with the two or  
22 three documents before?  
23 A Yes.  
24 Q That's where he enclosed which document?  
25 A That's where he enclosed the second document



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1 that was sent via e-mail.  
2 Q 129?  
3 A Yes.  
4 Q 132, that's where he's noting the mistake had  
5 been made?  
6 A That's correct.  
7 Q 133 is what?  
8 A My response to his question.  
9 Q That you are choosing the first option, which  
10 meant what?  
11 A (Witness examines document.)  
12 I will be seeking an attorney or  
13 representative. My interview is to be  
14 suspended up to 30 days.  
15 Q Okay. And you actually exercised that right  
16 and had your attorneys present. We talked  
17 about that earlier, correct?  
18 A Yes.  
19 Q Okay. 134, it looks like the major is asking  
20 you for your city cell phone number.  
21 A Yes.  
22 Q What's the significance of that?  
23 A Notice the date at the top, April 13th.  
24 Notice my response, which should be the next  
25 page, 135. Personal cell phone is 351-6827,

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1 Q The TRO that was dismissed, right? That one?  
2 Is that the one we're referring to?  
3 A Yes. May 22nd, yes.  
4 Q Okay. Go back to what? What document do you  
5 want to go back to?  
6 A 135.  
7 Q Okay.  
8 A You are trying to insinuate that the reason  
9 he sent this e-mail inquiring about my cell  
10 phone is because there was an issue with me  
11 not answering it. That wasn't the case.  
12 The reason he was requesting my cell  
13 phone is because he just recently had  
14 returned back to patrol support. So he was  
15 e-mailing everybody under his chain for their  
16 numbers, just in case he needed to contact  
17 them if they weren't answering their office  
18 phone.  
19 Q Okay. And you don't have a problem with the  
20 major trying to run the department that he's  
21 assigned to, do you?  
22 A I don't think I ever made any assertions that  
23 I had an issue with the major running the  
24 department.  
25 Q All right. 137, that's just kind of a

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1 and the business cell phone. Major, I listed  
2 my personal as primary because I always have  
3 it with me. I can turn into PD, if needed.  
4 I do not have a problem with you using your  
5 personal cell. You understand that are you  
6 to answer your personal phone while on  
7 duty.  
8 Q Was there some allegation that you weren't  
9 being responsive when people were trying to  
10 call you?  
11 A When that came out?  
12 Q Yes.  
13 A No, sir.  
14 Q Okay. Do you have a problem with that?  
15 A With what?  
16 Q With the major asking you for your cell phone  
17 number?  
18 A I never had a problem with it. The reason I  
19 referenced this is because later on, on May  
20 27th, he brings up the same issue, in which  
21 he said it was already addressed.  
22 Q Okay.  
23 A But that was after the TRO.  
24 Q All right.  
25 A And let's go back to 135.

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1 continuation of that e-mail chain?  
2 A (Witness examines document.)  
3 Which chain?  
4 Q It looks like it's a chain from 136 to 137,  
5 it's the same chain.  
6 A Are you talking about the e-mail where they  
7 changed my working hours?  
8 Q Well, I'm looking at 137. Maybe it's not,  
9 because it has a different date.  
10 What is 137 for?  
11 A Well, I was following instructions, that when  
12 they changed my working hours and prohibited  
13 me from speaking to somebody which, you know,  
14 is kind of borderline on your first amendment  
15 right. But I just e-mailed the captain to  
16 apprise him of what I would be doing on my  
17 daily activities.  
18 Q Who did they instruct you not to talk to?  
19 A Hold on one second. Let me refer to the  
20 e-mail. (Witness examines document.)  
21 Okay. Right here. Additionally, as a  
22 result of a meeting between Major Alfred and  
23 I, you are no longer to participate in a  
24 gathering, meeting or otherwise congregate in  
25 situations that are not specifically related

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1 to assignments, tasks and/or  
2 responsibilities, as associated with your  
3 current assignment with patrol support. You  
4 are to make yourself available to respond to  
5 calls for service on the road as a field  
6 supervisor if there are no other assignments  
7 for you to complete.  
8 Q Okay. It doesn't say anything about a  
9 specific person, does it?  
10 A You asked me about a specific person. I  
11 never said that.  
12 Q All right. And you don't have a problem with  
13 the major wanting his officers to perform the  
14 tasks that they're being paid by the  
15 taxpayers to perform, do you?  
16 A No.  
17 Q Okay.  
18 A I'm not finished.  
19 Q All right.  
20 A That's the reason I supplied you with the  
21 duties of a patrol support lieutenant, which  
22 is considered an administrative lieutenant.  
23 The reason this is here is because no other  
24 administrative lieutenant was required to  
25 answer a call for service but me.

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1 that?  
2 A (Witness examines document.)  
3 That is an official document in which --  
4 or one of the documents from the Lafayette  
5 Police Department counseling form, in which  
6 Chief James Craft and Glen Dartez were  
7 playing a joke on each other, which shows  
8 their friendship, as well as them utilizing a  
9 document to play jokes.  
10 Q How did you get a copy of that?  
11 A I don't know, Mr. Corry.  
12 Q Pardon?  
13 A There was an envelope that was put in my bin.  
14 Q When?  
15 A I -- I can't tell you the exact time or date  
16 when that happened.  
17 Q Obviously sometime recently, or back in '04,  
18 when this was generated?  
19 A No. No. I don't think it's '04.  
20 Q Have you ever joked with anybody at the  
21 police department?  
22 A Verbally, yes. Not on an official  
23 document.  
24 Q 141 is the law enforcement code of ethics?  
25 A Yes.

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1 Q All right. 138 -- (Interrupted)  
2 A I'm --  
3 Q Go ahead.  
4 A I'm still not finished.  
5 No other administrative lieutenant --  
6 Q How do you know that?  
7 A Because I spoke to them.  
8 Q Who did you speak to, what other  
9 administrative lieutenants did you speak  
10 to?  
11 A There was Lieutenant Jim Morris. There was  
12 Administrative Lieutenant Phil Fontenot.  
13 Gabe Thompson. I'm trying to think of the  
14 administrative lieutenants for Precinct 1.  
15 Luranie Richard, as well as Bert Bejsovec.  
16 Q All right. 138 is just a cover of an  
17 envelope containing the items listed in 139.  
18 Accurate?  
19 A Say that again. You're going a little too  
20 fast.  
21 Q 138 is an envelope cover containing the items  
22 noted in 139. I think they were provided to  
23 us on the zip drive.  
24 A Yes.  
25 Q All right. 140, that's the Dartez -- what is

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1 Q Is that a complete document?  
2 A (Witness examines document.)  
3 No. There's a piece missing off of  
4 it.  
5 Q Okay. 142 looks like it's your employment  
6 history, or -- yes, your employment history  
7 starting on June 25th of '90. Is that  
8 accurate?  
9 A Yes.  
10 Q And that goes through 148. Are those  
11 altogether, or not?  
12 A Which ones?  
13 Q 142 to 148.  
14 A It goes further than that.  
15 Q What is that? It looks like your application  
16 for employment or something.  
17 A No, sir. That's my employment history from  
18 -- that was in the civil service file.  
19 Q Okay. So it goes from 142 to what?  
20 A 142 to 181.  
21 Q All right. And how do you describe that?  
22 That's your -- it's a file you got from civil  
23 service?  
24 A Employment history from civil service.  
25 Q Okay. Is there anything significant, other

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1 than it's showing your employment history  
2 throughout your -- throughout the dates  
3 noted?  
4 A Yes.  
5 Q Okay. What?  
6 A Number one, it shows the 22-1/2 year police  
7 officer, that had no disciplinary record  
8 entered into the civil service up to the last  
9 six months of his employment.  
10 Two, it establishes that anytime there's  
11 any change in a classified civil service  
12 employee status, which is in relation to  
13 Louisiana Revised Statute 2503, a personal  
14 action form is filled out.  
15 As you noted, or as you can see in  
16 there, I was here through six chiefs. Just  
17 about all of them did personal action forms.  
18 But now, it was determined that that form  
19 doesn't exist, and it wasn't an adopted form.  
20 But this entire employee packet right here,  
21 this personal action form, advises civil  
22 service of my change of status.  
23 Q Are you saying that a personal action request  
24 was not completed on you?  
25 A No, I'm not saying that.

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1 Q Okay.  
2 A Let me finish.  
3 Q Were you -- (Interrupted)  
4 A Go ahead.  
5 Q Let me finish.  
6 Were you not in the room at the time?  
7 A You asked me if I was present. If I'm not  
8 present, I'm not in the room.  
9 Q Oh, so you were not present?  
10 A No.  
11 Q I thought you said you were present.  
12 You were not present at that hearing?  
13 A No, sir.  
14 Q Okay. Go ahead.  
15 A All right. Louisiana Revised Statute 2503  
16 clearly states it on this form.  
17 Q Well, it's not so clear. Because the Civil  
18 Service Board is taking it up in Mr. Stelly's  
19 -- and you're welcome to go get a transcript  
20 from them, because they discussed that form  
21 when Mr. Stelly brought it before the board.  
22 A It's a state --  
23 Q It was discussed in detail.  
24 A It's a state law.  
25 Q Take it up with the board.

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1 Q Okay.  
2 A What I'm saying --  
3 Q They were all completed on you?  
4 A Will you let me answer the question, Mr.  
5 Corry?  
6 Q Sure.  
7 A No, I'm not saying that. What I am saying  
8 is, I was placed on administrative leave.  
9 And I stand to be corrected. Yes, there  
10 wasn't one done on me.  
11 Q I'm sorry?  
12 A There wasn't one done on me.  
13 Q Okay. Is it when?  
14 A Administrative leave.  
15 Q Is there a requirement that a personal action  
16 request be performed, or be prepared on  
17 administrative leave?  
18 A Yes, sir.  
19 Q Were you present at the hearing that we had  
20 recently with the Civil Service Board, where  
21 Mr. Stelly brought that issue before the  
22 board?  
23 A Yes, sir.  
24 Q And did you hear their vote?  
25 A No, sir.

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1 A Okay.  
2 Q Because it was discussed in detail with the  
3 board.  
4 A Good.  
5 Q All right. Anything else between 142 and  
6 181?  
7 A No.  
8 Q All right. 182 -- how far does document 182  
9 go through?  
10 A (Witness examines documents.)  
11 236.  
12 Q All right. And 182 through 236 is what?  
13 A Medical history.  
14 Q Medical reports, or how would you --  
15 (Interrupted)  
16 A History.  
17 Q Medical history. As maintained by who?  
18 A That's a million dollar question, according  
19 to city nurse. She was supposed to maintain  
20 it. But the files were kind of transferred  
21 back and forth from her office to Luwanda  
22 Sheer's office, who is now retired. And she  
23 had some issue with that, because she said  
24 that maybe in violation of HIPAA. So I can't  
25 answer who maintained it.

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1 Q Where did you get documents 182 through  
2 236?  
3 A The city nurse.  
4 Q Who is that?  
5 A Kim Baer.  
6 Q And when did you get those?  
7 A (Witness examines his documents.)  
8 Q What are you looking for?  
9 A The scheduled appointment with Dr. Chen,  
10 where I was supposed to do a fit for duty.  
11 Q Look at -- hold on. I just saw it. Does 185  
12 help you?  
13 A (Witness examines document.)  
14 That's it.  
15 Q Okay. And the original -- (Interrupted)  
16 A The date is 8/24, is when I received it.  
17 Q Okay. So you received 182 through 236, on  
18 August 24th, 2012, as document GC-185  
19 refreshed your memory?  
20 A Yes.  
21 Q All right. The issue about the polygraph,  
22 you were initially required to give a  
23 polygraph and you went there. And there were  
24 some questions asked of you. And it was the  
25 interpretation of, was it Provost?

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1 A I will.  
2 I went over to take a polygraph. If  
3 memory serves me correct, I think it's --  
4 Q We're going to get to that.  
5 A Whatever date.  
6 Q Yes, we're going to get to it.  
7 A Went to take a polygraph. During the course  
8 of him asking medical -- family medical  
9 history, I discussed about an elevated blood  
10 pressure every now and then. It wasn't  
11 monitored. I wasn't seeing any physician,  
12 whatever.  
13 And at the conclusion at the  
14 preinterview for the polygraph, he left. He  
15 came back, and told me that he wouldn't be  
16 able to do it after a discussion with  
17 Lieutenant Prejean. And they had decided  
18 collectively, that I shouldn't take the  
19 polygraph because of lack of sleep and a  
20 medical condition. But he didn't specify  
21 what condition.  
22 Q Had you not had a lot of sleep the night  
23 before, were you working that night? Or why  
24 did the lack of sleep issue come up?  
25 A I can't remember, Mr. Corry. That's --

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1 A Go ahead, finish, Mr. Corry. I don't know  
2 where you're going, before I answer that.  
3 Q About the racing heart issue. Who were you  
4 in discussions with, Joey Provost?  
5 A When the racing heart came up?  
6 Q Yes.  
7 A I wasn't in discussion with Joey Provost at  
8 all with the racing heart, because I never  
9 mentioned that.  
10 Q All right. I understand that.  
11 But there were some discussion at some  
12 point that he interpreted something you said,  
13 that perhaps you had a racing heart, or some  
14 heart issue. I think you were there at the  
15 civil service hearing when that was brought  
16 up, correct?  
17 A Yes, I was at the civil service hearing.  
18 Q All right. And he did not initially  
19 administer the polygraph because he had some  
20 concerns, correct? You went to give the  
21 polygraph, and he wouldn't do it. Then you  
22 came back later on and had it done after you  
23 went and saw Dr. Chen. Is that fair?  
24 A No.  
25 Q Tell me the sequence of events.

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1 you're asking me something that happened  
2 about two years ago, almost three years.  
3 Q Okay. Wouldn't you want them to err on the  
4 side of caution if you weren't in the state  
5 best for you to give a polygraph, that it  
6 should be put off? I don't understand why  
7 there's such a big issue with that. They put  
8 it off because they were looking for you,  
9 weren't they?  
10 A No, sir. That's -- don't make it seem  
11 something that it's not.  
12 And it wasn't a misinterpretation,  
13 because if it was, you have the audio  
14 recording that you could go back and play.  
15 Like I said earlier, you're in Internal  
16 Affairs. Your only job is to investigate  
17 officers. So that should be paramount  
18 because their livelihood is in the palm of  
19 your hands, so you shouldn't be making  
20 mistakes like that. You see, there's  
21 mistakes after mistakes after mistakes in  
22 this investigation.  
23 Dwayne Prejean was making mistakes.  
24 Joey Provost was making mistakes. How many  
25 mistakes you need to make? But you're taking



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1 food off of somebody's table. But that's  
2 okay to make a mistake. Oops.  
3 No, sir. That's unacceptable. The  
4 bottom line is, I specifically told him that  
5 I had -- my family has a medical history of  
6 hypertension. And he asked me, he said,  
7 well, do you have it? Is there anything? I  
8 said, last checkup I had, it was kind of  
9 elevated but it was nothing alarming. It was  
10 nothing that needed -- required monitoring,  
11 or anything of that nature.  
12 How you misinterpret that, I don't know.  
13 It wasn't a language that I was speaking to  
14 him besides English.  
15 Q It works to your benefit, though.  
16 A No, no, sir. No, no, no, no.  
17 Q Why not? Were you going to pass the  
18 polygraph that day?  
19 A No, no.  
20 Yes. But here's --  
21 Q As opposed to when you gave it to later on?  
22 A Well, the problem you have is, this  
23 polygraphist is not credible because he went  
24 up there and lied. He basically was adamant  
25 about testifying. I told him I had a racing

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1 I had also said that it was nothing  
2 alarming where I had to be monitored by a  
3 doctor, or anything. So --  
4 Q Okay. Was there any harm to you by not  
5 giving it that day?  
6 A I wanted to give it that day.  
7 Q Okay. But you had the opportunity to give it  
8 later on after you were cleared. Wouldn't  
9 you want to err on the side of caution?  
10 A That's not the issue here, Mr. Corry.  
11 Q All right.  
12 A I gave the polygraph.  
13 The issue here is, officers went up  
14 there and personally lied, which is a  
15 violation of the general order.  
16 Q Well, that's up for debate.  
17 A It's not going to be up for debate. I'm  
18 going to prove that.  
19 But that's -- you jeopardized somebody's  
20 career behind that.  
21 Q All right.  
22 A And that's unacceptable.  
23 Q Anything else in 182 through 236, other than  
24 -- (Interrupted)  
25 A And let me add. You was aware that they

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1 heart. So why would I trust somebody that's  
2 not credible?  
3 And he never went up there and said,  
4 well, I think Greg said that. He was adamant  
5 about saying that's what I said. Dwayne  
6 Prejean went up there and said, I said I had  
7 a racing heart beat. Chief Craft agreed with  
8 them.  
9 Now, I don't know, but the last time I  
10 checked, none of them have an MD behind their  
11 name to diagnose me with a racing heart.  
12 Q But you did tell them that you had  
13 hypertension and a history of high blood  
14 pressure.  
15 A No, I didn't say I had hypertension. I said  
16 my family has a medical history of  
17 hypertension.  
18 Q And that your blood pressure had been  
19 elevated before?  
20 A On an checkup.  
21 Q All right.  
22 A But let me finish --  
23 Q All right.  
24 A -- for clarity purposes, because you're  
25 venturing off to something else.

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1 weren't telling the truth because you didn't  
2 want for them to go get the recordings.  
3 Q Mr. Cormier, don't insinuate anything about  
4 what I knew or didn't know.  
5 A I'm not insinuating anything, Mr. Corry.  
6 Q Don't do it.  
7 A I'm not.  
8 Q I'm telling you.  
9 MR. SPRING:  
10 Can we take a break now for lunch,  
11 maybe, 45 minutes?  
12 MR. CORRY:  
13 Yes.  
14 (LUNCH BREAK TAKEN IN DEPOSITION  
15 FROM 12:04 P.M. TO 1:10 P.M.)  
16 MR. CORRY:  
17 Q Greg, jumping back for a second.  
18 On D-1, the document that you whited  
19 out, why did you white it out? Why did you  
20 Wite-Out the information that you did?  
21 A Because it had information from an  
22 investigation for an officer.  
23 Q And you didn't want that to be disclosed?  
24 A That's correct.  
25 Q So you knew that it was personal information,

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1 it was a personal form?

2 A I'm not saying personal information. I just

3 didn't want that officer's name on it.

4 Q Okay. If D-1 is the same as GC-79, that SOP

5 that we looked at earlier, why did you have

6 to take this one out of the investigative

7 file?

8 A Because it was readily available at the time.

9 Q Okay. All right. Let's go back to the

10 documents.

11 We were on your medical file up through

12 236. Was there anything else in there that

13 was of significance that you wanted to bring

14 out?

15 A Yes. Let me go back to the administrative

16 leave issue, as far as civil service, when

17 you was referencing it was just a mistake.

18 Q What number are you on? Are you on a

19 particular document?

20 A No.

21 Q Okay.

22 A I'm following up on the conversation that we

23 had before we went on break.

24 Q Okay.

25 A And you referenced making mistakes and, you

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1 FFD, that's what that acronym stands for, I

2 assume -- to do employee claim. He has a

3 racing heart. Will approve for a stress, I

4 guess, it looks like fit and stress test

5 needed. Narrative, repair, initials Kim

6 Baer.

7 But if you go just above that, as

8 consultation with Luwanda Sheer, risk

9 manager, with reference to fit for duty test,

10 advised Luwanda Sheer would be consulting

11 with Chief Jim Craft and advise. So --

12 Q These are Ms. Bear's notes?

13 A That's correct.

14 Q So I guess it's best to talk to her about

15 what they mean and what the initials mean et

16 cetera?

17 A I spoke to her.

18 Q Okay.

19 A And the reason I'm making reference to this,

20 she told me that not only Joey Provost and

21 Dwayne Prejean said I had a racing heart,

22 Chief Craft said that I had a racing heart.

23 So it was a concerted effort through all

24 three of them to say have a racing heart,

25 which that never came out of my mouth.

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1 know, people make mistakes, they're human.

2 The only difference with that is, an officer

3 is held accountable for his mistakes for

4 something in that nature. That was the

5 purpose of me filing this complaint with

6 civil service, particularly on something as

7 serious as that.

8 Like I said, when you're dealing with

9 somebody's livelihood, you should be held

10 accountable.

11 Q Okay.

12 A All right.

13 Q Anything else on the medical documents that

14 we went through, 182 through 236?

15 A (Witness examines documents.)

16 Yes. Let's look at 184.

17 Q Okay.

18 A Go down to 158, I guess is -- I don't know if

19 it denotes p.m.

20 Q Yes.

21 A But 158.

22 Q Okay.

23 A I received a call from Luwanda Sheer, risk

24 management, had the initials RM, I assume.

25 Advised she sent employee for fit for duty --

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1 Q Okay.

2 A But it's a mere mistake, correct?

3 Q And you were cleared by Dr. Chen?

4 A No, sir. I never went to Dr. Chen.

5 Q You never went to Dr. Jeffery Chen?

6 A No, sir.

7 Q Why not?

8 A There was no need for it.

9 Q Okay.

10 A First of all, there was -- let me --

11 First of all, there was a question in

12 order for you to be referred to a specialist,

13 you have to go to a general practitioner, or

14 a physician to deem you having an issue that

15 requires some type of position in a

16 specialized field.

17 Q So you went to Dr. Swan, and he cleared

18 you?

19 A Yes, sir.

20 Q Okay.

21 A That's GC-186.

22 Q Okay.

23 A Even after I was cleared, I was still

24 required to bring a medical release form, or

25 some documentation in order to submit to the

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1 polygraph.  
2 Q Well, the GC-186, you were actually seen for  
3 a lumbar strain, not for -- (Interrupted)  
4 A No, sir. I was seen for an overall physical.  
5 Q Why does it say diagnosis, lumbar strain?  
6 A Because I had an accident during the course  
7 of me being on administrative leave.  
8 Q Okay. So you did tell Dr. Swan, as evidenced  
9 in 186 and 187, which I guess is the same  
10 thing, that you had had a back injury and  
11 were suffering from a lumbar strain?  
12 A Yes.  
13 Q And he examined you for that?  
14 A Yes, he did.  
15 Q Okay. Did he examine anything having to do  
16 with your heart?  
17 A I did an overall physical.  
18 Q So that included your heart?  
19 A Yes. And I explained the purposes of me  
20 coming here --  
21 Q Yes.  
22 A -- was for a physical for fit for duty.  
23 During the course of it, the  
24 questionnaire was, do you have any other  
25 injuries? And that's how the lumbar strain

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1 MR. CORRY:  
2 Q Yes.  
3 A (Witness examines documents.)  
4 That's me signing it and submitting for  
5 the request, 237. 255 is when they provided  
6 me with the document. I requested the  
7 receipt. I received it.  
8 Q Okay. And that was the statement we talked  
9 about earlier.  
10 All right. 256, it looks like an  
11 Independent news story of eight pages. Is  
12 that accurate? Taken out of the Independent  
13 Weekly, 256 through 263.  
14 A (Witness examines documents.)  
15 Yes.  
16 Q All right. Did you have -- did you provide  
17 any of the information contained within that  
18 newspaper article?  
19 A No.  
20 Q All right. 264 looks like another nine-page  
21 document from the Independent Weekly. It  
22 goes from 264 to 272. Did you provide any of  
23 the information contained within that  
24 newspaper article?  
25 A What numbers are you referring to?

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1 came about.  
2 Q All right. 182 to 236 is your medical  
3 history as contained in the city nurse's  
4 office, or -- where did you obtain these  
5 documents?  
6 A (Witness examines his documents.)  
7 I answered that earlier, Mr. Corry. The  
8 city nurse --  
9 Q Okay.  
10 A -- provided me with the documents.  
11 Q Okay. All right. And then, 237 is where you  
12 got a copy of the statement which is -- we've  
13 talked about earlier, 238 -- I think it was  
14 17 pages, if I'm not mistaken -- yes, through  
15 254, regarding the Glen Dartez investigation.  
16 And 255 looks like a copy of 237, except  
17 it's got you received it, or somebody  
18 received it.  
19 A Which one are you referring to?  
20 Q 255 and 237 are the same thing, it's just got  
21 the received by.  
22 A 235 and what, 257?  
23 Q No.  
24 MR. SPRING:  
25 237, 255.

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1 Q 264 through 272.  
2 A No.  
3 Q All right. 273 through 278 is another  
4 Independent Weekly news article. It looks  
5 like it's six pages. Did you provide any of  
6 the information contained within that  
7 document?  
8 A (Witness examines documents.)  
9 No.  
10 Q All right. 279 is you being notified of your  
11 shift level investigation for 2012-005, and  
12 that's where you received the letter of  
13 reprimand. Is that accurate?  
14 A No.  
15 Q It's not?  
16 A Yes. It's not.  
17 Q You didn't receive notice of your  
18 predetermination hearing?  
19 A That's not what you said. You said received  
20 notice of my investigation.  
21 Q I'm sorry. Scratch that.  
22 279 is you being notified of your  
23 predetermination hearing regarding  
24 SL-2012-005?  
25 A Correct.

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1 Q All right.  
2 A Before you go any further.  
3 Q And then -- (Interrupted)  
4 A Refer back to GC-279.  
5 Q Yes.  
6 A Okay. You notice who's the author of it, the  
7 bottom? Captain Ned Ewing.  
8 AD-2012-007, predetermination notice,  
9 it's the human resource director, Ray  
10 Domingue.  
11 Remember you asked Gabe Thompson about,  
12 have you ever had any other occasions where  
13 you recall the human resource director  
14 disseminating a predetermination notice, or  
15 deciding what violations was being cited?  
16 They never have. This is the documentation.  
17 And I can show you some more where they never  
18 get involved. This is a special case that I  
19 was terminated on.  
20 Q All right. 280, 281, we talked about.  
21 That's your letter of reprimand, correct?  
22 A Yes.  
23 Q 282 and 283, I think we saw these earlier.  
24 But that's the notice -- investigation of  
25 possible misconduct. And then, your rights

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1 Q No.  
2 A -- being issued?  
3 Q No. If the TRO -- (Interrupted)  
4 A I'm trying to get some clarity. And once I'm  
5 finished, I'll let you know.  
6 Q Okay.  
7 A Then, if it's not the question that you  
8 posed, if it's incorrect, then okay.  
9 What you're saying is, be it that the  
10 TRO was filed that morning, May 22nd of 2012,  
11 and the letter of transfer was disseminated  
12 out the same afternoon of the same day the  
13 TRO was filed, you're saying if they had  
14 discovered that it was filed somewhere down  
15 the line, I would change my testimony?  
16 Or are you saying if the TRO was filed  
17 -- well, you tell me.  
18 Q Well, let me scratch that.  
19 A Yeah.  
20 MR. SPRING:  
21 Just reask it.  
22 MR. CORRY:  
23 Q Let me reask it.  
24 Do you have any information to suggest  
25 that Chief Craft knew about the TRO at the

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1 is 283, where you signed off.  
2 A Yes.  
3 Q 284 is a transfer of May 22nd, 2012. And  
4 it's a three-page document. Correct?  
5 A Yes. The same day the -- well, this came  
6 that afternoon after the TRO was filed in  
7 district court, which shows evidence of  
8 retaliation.  
9 Q Do you know when the city officials, either  
10 the administration, or Chief Craft, or anyone  
11 -- or Chief Craft found out about the TRO  
12 suit being filed?  
13 A No, sir.  
14 Q You don't know when they found out?  
15 A No, sir.  
16 Q So if they found out after that transfer  
17 notice, you would change your testimony?  
18 A Repeat that again.  
19 Q If they found out about the TRO after this  
20 transfer notice, would you change your  
21 opinion that the transfer was as a result of  
22 the TRO?  
23 A You're asking me if the -- if they found out  
24 the TRO was filed on the same day of the  
25 transfer letter --

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1 time he issued this memo dated May 22nd,  
2 2012, regarding your transfer?  
3 A The guys at the police department were saying  
4 he knew about it, and he was upset.  
5 Q That's hearsay. You heard that from people  
6 in the police department?  
7 A That came from officers at the police  
8 department. Now, there were so many  
9 officers, I'm not going to be able to give  
10 you exactly how many officers and the  
11 individual names. But there's nothing in  
12 that department that's considered  
13 confidential. And as soon as an individual  
14 discovers something, it spreads like wild  
15 fire.  
16 Q All right. And the transfer that you  
17 received effective June 10th, on page GC-285,  
18 you were transferred from patrol division,  
19 patrol support under the supervision of  
20 Captain Ron Czajkowski, to patrol division  
21 Precinct 4, Shift C, shift lieutenant under  
22 the supervision of Captain Cornell  
23 Montgomery. That's accurate?  
24 A Yes.  
25 Q Was your pay changed?



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1 A No.  
2 Q Did you any of your benefits change?  
3 A No.  
4 Q Did your work hours change?  
5 A Yes.  
6 Q How so?  
7 A I went from working 8:00 -- not really 8:00  
8 to -- well, it was 8:00 when -- on the 27th,  
9 they changed my working hours from me having  
10 it for almost two years in that section. But  
11 it went from working 8:00 to 5:00, Monday  
12 through Friday, and off on weekends, to  
13 working the 12-hour evening shift, rotating  
14 shift, where you work two days on, three days  
15 off, then three days on, two days off, and  
16 you worked nights.  
17 My responsibilities changed. I went  
18 from -- which is, you know, the motion. It  
19 went from not being responsible for 48 guys,  
20 as opposed to ten, 12 guys at the most, not  
21 conducting administrative investigations.  
22 Q So you had less to do?  
23 A Far less.  
24 Q Pardon?  
25 A Far less.

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1 transfer anybody he wants at any time, does  
2 he not?  
3 A Well, it's just ironic --  
4 Q Wait, wait, wait.  
5 A Go ahead. Go ahead.  
6 Q You have to answer the question.  
7 MR. SPRING:  
8 Answer the question.  
9 MR. CORRY:  
10 Q Does he not?  
11 A Say it again.  
12 Q Doesn't the chief have the ability to  
13 transfer anybody he wants at any time within  
14 his department?  
15 A Yes.  
16 Q Okay.  
17 A Hold on, Mr. Corry. Let me finish.  
18 Q Go ahead.  
19 A But if it's not in a discriminatory and a  
20 retaliatory manner.  
21 And if I knew you was going to pose that  
22 question, I would have provided you with the  
23 civil service law that says you can't do  
24 it.  
25 Q All right. 287 is what, where your hours

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1 Q Okay. And that was a problem?  
2 A It was a problem because of the working  
3 hours, as well.  
4 Q And some police officers have to work nights,  
5 right?  
6 A No, sir.  
7 Q None do?  
8 A Let me finish that question. You're right,  
9 yes, some have to work nights.  
10 But I went from an administrative  
11 lieutenant position with no former  
12 documentation to show that I wasn't  
13 proficient in that area. There's a recording  
14 of Chief Craft making reference to the third  
15 floor boys, which, it was common knowledge if  
16 you pose that question to Jim Craft, the  
17 police chief, he's going to tell you who were  
18 the third floor boys, in which he says, you  
19 know, as long as they're doing their jobs, I  
20 can't help that.  
21 So in essence there, he's saying, you're  
22 doing -- we're working, doing the job in a  
23 proficient manner. But yet, you are  
24 transferred.  
25 Q Well, but the chief has the authority to

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1 were changed?  
2 A I think we covered that already. Not only  
3 were the hours changed, there was an alleged  
4 issue that was brought up where they couldn't  
5 get in contact with me.  
6 When I went to Captain Czajkowski, and  
7 inquired about who was trying to call me, not  
8 only I spoke with him, I communicated with  
9 him via e-mail, which you can see up here,  
10 who was trying to contact me and what phone  
11 number were they trying to contact me from.  
12 He never responded. He was extremely  
13 evasive. Thereafter, this is  
14 the e-mail that was prompted from our  
15 conversation, where he and Major Alfred  
16 collectively decided that they were going to  
17 change my hours, and prohibited me from  
18 communicating with anybody, if it's outside  
19 the realm of my duties as a patrol support  
20 lieutenant.  
21 Q Okay.  
22 A Go ahead.  
23 Q And the major and the captain have the  
24 authority to change your work hours, do they  
25 not?

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1 A Yes.  
2 Q Okay.  
3 A I'm not finished.  
4 Q Go ahead.  
5 A Just ironic, the TRO was filed May 22nd.  
6 Prior to that, Major Alfred was in -- I can  
7 tell you this. He was there since April of  
8 that same year. There was no issue until the  
9 TRO was filed. He never had an issue of  
10 contacting me. There's no documentation  
11 where I was called in, and I was formally  
12 counseled for failing to answer my phone, be  
13 it office phone or cell phone. But all of a  
14 sudden, my hours changed and he can't get in  
15 contact with me.  
16 Q This is -- (Interrupted)  
17 A This is after the TRO.  
18 Q Yes. Go ahead and look at GC-364 for me real  
19 quick.  
20 A (Witness complies.)  
21 Q Are you there, GC-364?  
22 A Yes.  
23 Q What's the date of that?  
24 A May 11th.  
25 Q 2012?

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1 A When?  
2 Q One of your e-mails, doesn't it say he was on  
3 vacation?  
4 A He was on vacation afterwards, after he  
5 responded several days later. But the  
6 evaluation was due in June. Look at the date  
7 when the e-mail was sent out. We're in  
8 August.  
9 Q In your 22 years at the LPD, did you ever  
10 have a performance evaluation done where you  
11 didn't talk to the person evaluating you?  
12 A No.  
13 Q You talked to them every time?  
14 A Yes, sir.  
15 Q Okay. And that's documented?  
16 A It's not only documented, it's in the  
17 performance evaluation manual.  
18 Q All right. Did you ever talk to Captain  
19 Czajkowski about your performance  
20 evaluation?  
21 A No, sir. I was terminated before that  
22 occurred.  
23 Q Okay. 291 and 292 is what? Back to the cell  
24 phone? I think we talked about those  
25 already, right?

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1 A The day that it was authored?  
2 Q Yes.  
3 A Yes.  
4 Q Okay. And you received it on the 15th?  
5 A Yes.  
6 Q Okay. All right. Let's go back to 290, or  
7 289 and 290. I think we talked about that.  
8 No. Something to do with the performance  
9 evaluation.  
10 A (Witness examines documents.)  
11 Yes, sir.  
12 Q What was the issue with that?  
13 A There was numerous issues that I wanted to  
14 address. The performance evaluation wasn't  
15 accurate. It was placed in a bin, my bin  
16 when I was transferred from patrol support to  
17 Precinct 4 with no explanation.  
18 When you prepare a performance  
19 evaluation and you're the reader, you have to  
20 discuss the performance evaluation with the  
21 employee that you prepared it for. That was  
22 never done.  
23 Q Who did -- who prepared this one?  
24 A Captain Czajkowski, Ron Czajkowski.  
25 Q Doesn't it say he was on vacation?

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1 A Yes.  
2 Q 294 is your complaint to the board regarding  
3 the alleged payroll fraud. Is that accurate?  
4 A Which one?  
5 Q 294.  
6 A (Witness examines his documents.)  
7 You're referring to that particular  
8 document in itself?  
9 Q Yes. What is that? What is that for?  
10 A That's a letter that Dee Stanley sent to --  
11 the CAO sent to the Civil Service Board.  
12 Q Okay. And it contains your complaint  
13 regarding the payroll fraud of Lieutenant --  
14 alleged payroll fraud of Lieutenant Bert  
15 Bejsovec?  
16 A Yes. It contains the complaint, as well as  
17 the written report by the person conducting  
18 the investigation, human resource director,  
19 Ray Domingue.  
20 Q And 294 encompasses how far back?  
21 A (Witness examines his documents.)  
22 Up to 360, with the exception of a  
23 document that I had in my original file  
24 wasn't -- when I looked through it, it wasn't  
25 in your binder.

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1 Q Okay. So it goes from 294 to 360, and then,  
2 there were some additional documents provided  
3 this morning. Which number are you referring  
4 to? Was it in the 104?  
5 A No. It should be the document that I gave  
6 yesterday.  
7 Q Yesterday. Okay.  
8 That's this small stack.  
9 A That one (indicating).  
10 Q 685?  
11 A I can't see the number from here, Mr. Corry.  
12 That's correct.  
13 Q Okay. And you have it in yours. That's  
14 stuck in there. Okay.  
15 So 685 ought to be included in that  
16 payroll issue as well, correct?  
17 A Yes.  
18 Q All right. And do you know the outcome of  
19 the investigation?  
20 A From who?  
21 Q From the city.  
22 A It was unfounded.  
23 Q Okay.  
24 A But let me -- let me make sure. Let me not  
25 go on the record and say that. Let me give

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1 printed at the top.  
2 Q Okay.  
3 A That came from me. That was Lieutenant  
4 Bejsovec e-mailing that on the police -- his  
5 police -- via his police computer.  
6 Q All right. And that would have been e-mails  
7 from 354 to 360?  
8 A 354 to what?  
9 Q 360. That's the e-mails you're referring to?  
10 A No, sir. 363 is one. 360, no.  
11 Q 363?  
12 A Uh-huh (yes). Yes.  
13 Q 354 to 363?  
14 A Well, no. Not -- the way you have it  
15 numbered, there's some in there that's not --  
16 362 is JD's investigation e-mail.  
17 Q Okay.  
18 A 361 is the same. It's not correlated with  
19 that.  
20 Q Okay.  
21 A What we were discussing.  
22 Q All right. Do you know the complaint that  
23 you made and that was investigated by human  
24 resources, as you said, was unfounded?  
25 A I initially said unfounded. And then, I

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1 you the exact language of it.  
2 Q And how did you get a copy of 295?  
3 A 2 what?  
4 Q How did you get a copy of 295? GC-295, how  
5 did you get that?  
6 A That packet was placed in my bin.  
7 Q Do you know by who?  
8 A No, sir.  
9 Q So the packet being 294 to 360, plus the  
10 additional document we talked about, was  
11 placed in your bin?  
12 A The additional document that we just talked  
13 about, that I provided later --  
14 Q Yes.  
15 A -- no, that was given to me by retired  
16 Captain Dwayne Arceneaux.  
17 Q All right. But I asked how you got document  
18 295, and you said the packet was placed in my  
19 bin. I'm trying to figure out what the  
20 packet is. This 294 through 360 would be  
21 what you're referring to as the packet?  
22 A 394 to what?  
23 Q 294 to 360.  
24 A No, not the entire packet. There's some  
25 e-mails that you're going to see Greg Cormier

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1 said, let me refer to the official --  
2 Q And what document -- (Interrupted)  
3 A -- disposition letter.  
4 Q And what document is that?  
5 A 296.  
6 Q Okay. Does that refresh your memory?  
7 A (Witness examines document.)  
8 Yes, sir. It refreshes my memory.  
9 Also, the board president had a  
10 discussion with me, and he told me it was  
11 unfounded.  
12 Q When did you have that discussion with the  
13 board president?  
14 A I can't remember. It was -- it was, I guess,  
15 after they received the results. I don't  
16 know.  
17 Q Was it by phone or in person?  
18 A Person.  
19 Q At the civil service office?  
20 A (Witness shakes head negatively.)  
21 Q Where?  
22 A City hall.  
23 Q So you met with Board Chairman Boudreaux?  
24 A No, I didn't --  
25 Q Was it just the two of you?

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1 A I didn't personally meet with him. It was --  
2 if I'm not mistaken, it was after the civil  
3 service hearing.  
4 Q Okay. And he came up to you and said that it  
5 was unfounded?  
6 A He said it was unfounded, and if you want to  
7 appeal it to the board, if you're not pleased  
8 with the decision, you can, and we'll take  
9 that up at a later date.  
10 Q And did you do that?  
11 A Yes.  
12 Q Okay. What is the status?  
13 A They decided to implement a stay order. I  
14 don't know if it was on the heels of -- I  
15 can't remember the exact day, but I want to  
16 say it was -- I'm not going to say the exact  
17 date. But I know it was sometime after he  
18 went to the board, I want to say in  
19 September, and handed each board member a  
20 sheet of paper. I guess y'all had some kind  
21 of hearing in front of Judge Hanna. And he  
22 implemented some type of ruling, and --  
23 Q So it's still pending?  
24 A Will you let me finish explaining, Mr. Corry?  
25 Q Yes.

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1 until the federal lawsuit was concluded? Did  
2 you know that had taken place?  
3 A No, sir. But let me finish.  
4 Although the federal judge never  
5 mentioned anything about prohibiting civil  
6 service from conducting their normal  
7 business, the only issue he had was that he  
8 said it would be up to them if they won't  
9 allow the media in any civil service hearing,  
10 and that appeals governing employment is  
11 better suited in civil service.  
12 Q All right. Let's look at, I think 364 and  
13 365 we've talked about more than once. Is  
14 that accurate?  
15 A Will you hold on a second and let me get to  
16 it, please?  
17 Q Yes.  
18 A (Witness examines his documents.)  
19 I noticed on -- I make reference. Well,  
20 I guess it's a question that we have to ask  
21 the chief of police, why his name is on those  
22 documents.  
23 Did I answer your question, Mr. Corry?  
24 Q We've talked about these, right? Weren't  
25 they contained earlier in the binder?

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1 A Okay. Thank you.  
2 And after that September meeting in  
3 which you presented them with that document,  
4 they read a document, and they said that the  
5 there would be in violation of a gag order,  
6 if they would discuss any complaints, that  
7 they would have to review the lawsuit to see  
8 what was in the lawsuit. And thereafter,  
9 they implemented the stay order further down  
10 the line.  
11 After -- in November, the complaint  
12 issue with the administrative leave came up.  
13 And that's when they said, any complaints,  
14 with any litigants in the lawsuit that are  
15 plaintiffs, they won't hear it because it may  
16 be a conflict with the federal lawsuit that  
17 is pending, because they don't want to render  
18 a decision that may be contradictory to what  
19 the federal judge is going to do.  
20 Q Did you know that Mr. Hewitt had filed a  
21 complaint with the board and asked them to  
22 hear his appeal and they declined? And that  
23 that was appealed to the Fifteenth Judicial  
24 District Court, Judge Rubin, and he agreed  
25 with the board, they didn't have to hear it

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1 A Yes, sir.  
2 Q And then, 366, I think is -- we had talked  
3 about the polygraph and who got notice to  
4 give the polygraph. And you were going to  
5 dig for the document. And I said, well, I  
6 know we'll come to it while we're here. This  
7 is the one that you were referring to?  
8 A No, sir. There were several notices relating  
9 to this polygraph.  
10 Q Okay. Was this the first polygraph with the  
11 racing heart issue, or was this the second  
12 polygraph that you actually gave?  
13 A None.  
14 Q This wasn't?  
15 A No, sir.  
16 Q Okay. What is the significance of this?  
17 A The significance is -- you have the documents  
18 out of order. Because I was going to show  
19 the significance of -- this notice is sent to  
20 us, and then, there's another e-mail with the  
21 same dates in which it was sent out to  
22 yourself, Mr. Corry, as well as other people,  
23 human resource, Mr. Stanley, and a few  
24 others. Let me see if I can find it.  
25 I have it in my binder. I'm trying to



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1 find it in yours.  
2 MS. COREIL:  
3 What's the date on it?  
4 A July 6th.  
5 What number were you initially referring  
6 to, Mr. Corry?  
7 MR. SPRING:  
8 366.  
9 MR. CORRY:  
10 Q 366.  
11 A Okay.  
12 MR. CORRY:  
13 Is it in the stuff that he gave us?  
14 MS. COREIL:  
15 July 6th, you said?  
16 MR. CORRY:  
17 Yes.  
18 A That ones not in there.  
19 MR. CORRY:  
20 Q Well, you went through it last night and  
21 compared it, didn't you?  
22 A I guess I made a mistake, Mr. Corry.  
23 Q Even you make them, right?  
24 A But not with something of that magnitude like  
25 they did.

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1 Q All right.  
2 A You're not going to recall another incident,  
3 Mr. Corry.  
4 Q I'm sorry?  
5 A You're not going to find another incident  
6 where Mr. Domingue presided over a  
7 predetermination hearing in most recent  
8 events, where he authored the  
9 predetermination notice, and he actually  
10 cited all the violations. You're going to  
11 find it was always the assistant to the  
12 chief, who is a captain. Current position  
13 right now is Captain Ron Czajkowski. Prior  
14 to that, it was Captain Ned Ewing.  
15 Q So it's your belief that human resource has  
16 never authored a notice of predetermination  
17 hearing?  
18 A I didn't say never. I said in most recent  
19 events that I'm aware of, they haven't.  
20 Q Okay. 370 is your receipt.  
21 371 is the transcript, two pages. 371  
22 and 372 is the transcript of that  
23 predetermination hearing on September 7th.  
24 A 371?  
25 Q 371 and 372.

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1 Q We can shoot a copy of this at a break.  
2 So you were comparing 366 with this memo  
3 dated -- e-mail dated July 6th, 2012.  
4 And tell me what the -- what's the  
5 issue?  
6 A The individuals that they cc'd; Dee Stanley,  
7 Michael Hebert, Michael P. Corry.  
8 Q So it's just the cc's that is an issue for  
9 you?  
10 A No.  
11 Q Is that accurate?  
12 A No. The highlighted portion, Michael P.  
13 Corry.  
14 Q Okay. Just hold it out. We'll make a copy.  
15 A All right.  
16 Q Okay. 367, we talked about that earlier.  
17 368 is the notification of predetermination  
18 hearing for 2012-007. I think we talked  
19 about that earlier as well, dated September  
20 4th of 2012.  
21 A Yes. Turn to 369.  
22 Q Okay.  
23 A You notice the author of -- who was the  
24 author that authored that predetermination  
25 notice? Ray Domingue.

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1 A I noticed, because you were there, Mr. Corry.  
2 Q Yes. My name is misspelled, too. Correct?  
3 A So you -- I know -- I'm pretty sure there is  
4 some dialogue on --  
5 Q 371 and 372 -- (Interrupted)  
6 A I just want to make a statement.  
7 Q Is it in response to a question?  
8 A No. I'm not posing a question. I just want  
9 to make a statement on the record.  
10 I know I can't ask you any questions,  
11 because you said you do the questioning,  
12 correct?  
13 MR. SPRING:  
14 It has to be in response to a  
15 question.  
16 A All right. Go ahead.  
17 MR. CORRY:  
18 Q 371 and 372 is the transcript?  
19 A Yes.  
20 Q And your only explanation is on page 372,  
21 that says, quote, the only thing I can say is  
22 all these allegations that you cited, I  
23 didn't do. That's about it. That was the  
24 extent of your testimony, correct?  
25 A That is correct.

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1 Q All right. 373 is your transcribed statement  
2 involving the AD-2012-007 statement date,  
3 June 30th of 2012, where you had two lawyers  
4 present there with you, Mr. Spring and  
5 Mr. Alexander?  
6 A Yes.  
7 Q Okay. What is 379?  
8 A (Witness examines his documents.)  
9 Q It may be the back side of that faxed cover  
10 sheet. I'm not sure, though.  
11 Anyway, 380, 381 is me forwarding to  
12 your attorneys, your statement taken on June  
13 20th, in the predetermination, or  
14 predisciplinary hearing transcript of  
15 September 7th.  
16 A (Witness examines document.)  
17 Q Is that accurate?  
18 A Which one are you talking about?  
19 Q 381.  
20 A Yes, sir.  
21 Q Okay. 382 is another copy of your  
22 termination letter. It goes from 382 to 385.  
23 Accurate?  
24 A Yes, sir.  
25 Q Is there any particular reason you put it in

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1 the Lafayette Police Department?  
2 A No, sir.  
3 Q Do they do work for any police department in  
4 the State of Louisiana that you're aware  
5 of?  
6 A That question would be better suited for Mr.  
7 Lauland.  
8 Q All right.  
9 A I can't answer as far as all his credentials.  
10 I can tell you from conversing with him,  
11 he was deemed an expert witness in court  
12 testimony, based on --  
13 Q How many times did you meet with him?  
14 A Once.  
15 Q Have you met with him since, or have you  
16 spoken to him since?  
17 A No, sir.  
18 Q Did you meet with him on September 8th of  
19 '12?  
20 A I don't know if September 8th is the date. I  
21 don't know if it's the date that we met, or  
22 it's the date that he authored the letter. I  
23 can't -- I can't go on record and tell you.  
24 I know I met with Mr. Lauland --  
25 Q Okay.

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1 here so many times?  
2 A No, no particular.  
3 Q All right. And then, 386 is some type of  
4 psychological stress evaluator test that you  
5 were sent to by your lawyer with Lauland  
6 Security Consultants?  
7 A I don't know if you would call it a  
8 psychological. But it's a stress test that  
9 the police department utilizes, as well as a  
10 polygraph in order to determine if someone's  
11 telling the truth.  
12 Q You can explain, but you've got to answer the  
13 question first.  
14 A Yes.  
15 Q Your attorney sent you there?  
16 A No.  
17 Q Why is it addressed to him?  
18 A Because he accompanied me over there.  
19 Q Okay. How long did you spend with this  
20 guy?  
21 A Oh, I can't -- I can't tell you.  
22 Q You can't remember?  
23 A No, sir. That's -- that's September 8, 2012,  
24 Mr. Corry.  
25 Q Does Lauland Security Consultants do work for

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1 A -- and submitted to a test.  
2 Q All right. Had you ever had a psychological  
3 stress evaluator test prior to the one with  
4 Mr. Lauland?  
5 A No.  
6 Q Had you ever administered one?  
7 A No.  
8 Q Are you certified to administer a  
9 polygraph?  
10 A No.  
11 Q Are you certified to administer a  
12 psychological stress evaluator test?  
13 A No.  
14 Q What did they do to perform the psychological  
15 stress evaluator test on you?  
16 A What do you mean?  
17 Q Well, how did they do it? How was the test  
18 administered?  
19 A I think that's best suited for Mr. Lauland to  
20 answer.  
21 MR. SPRING:  
22 Tell him what you remember.  
23 A I can tell you what I remember is, they asked  
24 me a series of questions in relationship to  
25 the Olita Magee document that was allegedly

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1 released to her, pertaining to me releasing  
2 it.  
3 MR. CORRY:  
4 Q Did they ask you any questions other than the  
5 three that are contained in 386, or do you  
6 remember?  
7 A I can't remember, as far as that.  
8 Q All right.  
9 A I know that the three that you're referring  
10 to were the key questions.  
11 Q But there were others that they asked?  
12 A It could be, Mr. Corry. I don't want to go  
13 on record and tell you yes or no.  
14 Q All right.  
15 A It's been a awhile.  
16 Q Did they hook anything up to you when you  
17 were asked these questions?  
18 A I can't remember if that was the case.  
19 Q How does he determine that you answered the  
20 questions truthfully, by looking at you when  
21 you answer them?  
22 A Mr. Corry, I cannot answer that. That's  
23 better suited for Mr. Lauland.  
24 Q Okay.  
25 A But before we move forward, I can tell you

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1 Q Okay. All right. 388, that's when you're  
2 being placed on administrative leave, dated  
3 August 17th of '12. Is that accurate?  
4 A Yes. Let's discuss that document.  
5 Q Okay.  
6 A Look at number one, under the departmental  
7 fit for duty exam in reference to the medical  
8 condition that you advised was not being  
9 treated by a medical physician.  
10 They can remember that, but they can't  
11 remember that I said I had a racing heart.  
12 Okay. They can remember that detail.  
13 Q 389, what is that for?  
14 A 389 is a copy of my check stub.  
15 Q Okay.  
16 A Hold on. I'm going to explain the relevance  
17 of it.  
18 You notice pay period ending, it says  
19 9/15. If you look at the top, that starts  
20 from 9/15 to 9/21.  
21 Q All right.  
22 A Go down the description, do you follow me?  
23 Q Yes.  
24 A Okay. You go across, administrative leave.  
25 During that pay period, I was still on

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1 this, that the purpose of me taking it was, I  
2 knew I didn't provide that document to Olita  
3 Magee. This test proved it.  
4 It also proved that the Lafayette City  
5 Police Department utilizes the same mechanism  
6 in conjunction, or as well as the polygraph  
7 when they're conducting investigation  
8 pertaining to administrative leave, as well  
9 as criminal, where they feel that somebody is  
10 being deceptive. I passed. I passed this  
11 test.  
12 The same person that administered my  
13 polygraph, Joey Provost, said I failed it.  
14 But he's the same person that administered a  
15 polygraph, and there was a CVSA that was  
16 administered as well by Reggie Thomas, on an  
17 individual during the Mickey Shunick case.  
18 And he failed it.  
19 So what does that say about the test?  
20 Q Did you take this test with Lauland Security  
21 Consultants before or after you took the  
22 polygraph with Joey Provost?  
23 A After.  
24 Q After you had failed the polygraph?  
25 A Yes. After he said I failed it.

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1 administrative leave even after the board, on  
2 August 31st, and denied them an extension and  
3 told them to put me back to work, he still  
4 kept me on administrative leave, the police  
5 chief.  
6 Q I'm not sure -- do you know if the board has  
7 the authority to tell the chief whether he  
8 can or can't put somebody on administrative  
9 leave?  
10 A It wasn't the issue of he can or can't. He  
11 went there for an extension of the  
12 administrative leave, that's why we had the  
13 hearing, because of an alleged racing heart  
14 beat. It was determined that I didn't have  
15 it, and they told him, your extension is  
16 denied, conduct the polygraph, and that's it.  
17 When it was denied, I was supposed to  
18 return back to work. He didn't do it.  
19 Q Does the board have the authority to tell the  
20 chief how to run the department on a  
21 day-to-day basis?  
22 A Not on a day-to-day basis. But the board has  
23 the authority to advise him when he's  
24 violating an employee's due process rights.  
25 Q Did you make any complaints to anybody about

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1 that?

2 A Yes, I did. I filed a complaint with the

3 Civil Service Board about the violation of

4 administrative leave policy, as well as Joey

5 Provost, Chief Craft, and Dwayne Prejean,

6 lying in front of the Civil Service Board, in

7 relations to the administrative leave hearing

8 on August 31st.

9 Q All right. 390, that's an e-mail from you to

10 the people noted?

11 A Yes. The relevance of that e-mail is that

12 was Lieutenant Dwayne Prejean's smoking gun.

13 In the civil service hearing, he extracted

14 that from his, I guess his iPhone, his PD

15 iPhone. And that was his basis for saying

16 that I had a racing heart. And as you can

17 see, I make no reference to a racing heart.

18 Q But you make reference to heart, don't you?

19 A Racing heart.

20 Q No, no.

21 Do you make reference to heart? The

22 most notable issue, and I'm quoting, was my

23 medical condition, open paren, heart, closed

24 paren, period.

25 A And that was -- will you allow me to answer

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1 Q And the purpose of the e-mail was to make

2 sure that they were going to pay for it,

3 right?

4 A Of course. It wasn't my responsibility to

5 pay for it.

6 Q Certainly not.

7 And you had no problem going to a

8 cardiologist, did you?

9 A (No response.)

10 Q Did you?

11 A Yes.

12 Q You put it in there, that's your e-mail.

13 A Yes. Yes.

14 Q You would have gone to the cardiologist?

15 A No. You asked me if I had a problem going to

16 the cardiologist, and my response was yes.

17 Q Okay.

18 A But if they ordered me to go, I have no

19 choice to go. I'm compelled to do it.

20 Q All right.

21 A But the issue I had with them was, I was

22 being sent to a cardiologist in the absence

23 of a physician recommending me.

24 Q All right. GC-391 is the consent to be

25 polygraphed. That's the first time, and you

Page 362

1 it?

2 Q No. Is that in there?

3 A Yes, it's in there.

4 Q Okay.

5 A Now, let me answer it for you.

6 Q I'm not sure I asked a question. I just

7 wanted you to identify that language being in

8 that e-mail.

9 A You asked a question. You asked, do I make

10 any relations to heart in there?

11 Q Yes. And you answered that.

12 A That's a question. You said you're not sure

13 if you asked a question.

14 Q Okay.

15 A Okay. Then, let me expound on that.

16 The reason I put that in there, that was

17 after they denied me to take the polygraph

18 and put me on administrative leave. And

19 their explanation was for a racing heart.

20 Q All right.

21 A And that's why I make reference to physician,

22 cardiologist, because they wanted to send me

23 to some specialist.

24 Q And you just -- (Interrupted)

25 A A heart specialist.

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1 agreed, signed off on it?

2 A Yes.

3 Q All right. 395 is General Order 301.1,

4 polygraph examination. I think we talked

5 about that already.

6 All right. 404, this is your

7 performance evaluation of June 2011 to June

8 2012. This is the one you say you didn't

9 meet with Ron Czajkowski?

10 A That's correct.

11 Q All right. Look at 406, halfway down on

12 12/4/11. Do you see that?

13 A (Witness examines document.)

14 Yes.

15 Q You actually have a star by yours.

16 A Yes.

17 Q That was regarding a letter of reprimand for

18 the 60-day issue, right?

19 A No, sir.

20 Q That wasn't?

21 A No, sir. That's a bold face lie.

22 What he's referencing right here is the

23 investigation with JD, where he received a

24 one-day suspension.

25 Q How do you know that?



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1 A Because he would communicate with me on a  
2 regular basis on the status of that  
3 investigation because they were concerned,  
4 and he was getting pressure from the chief.  
5 And that's why he kept inquiring about the  
6 status update of the investigation.  
7 Q All right. What about on 407, that May 23rd,  
8 2012, notation that you have underlined, is  
9 that accurate?  
10 A As far as what, the --  
11 Q The contents.  
12 A -- the underline?  
13 Q No. As far as the contents of it.  
14 A No, it's inaccurate.  
15 Q Why?  
16 A Because I was never apprised that I was going  
17 to be the coordinator of the Mickey Shunick,  
18 as the go between between patrol and CID.  
19 And if you notice, the reason it's  
20 underlined is the day after the TRO was  
21 filed. Kelly Gibson didn't want to  
22 communicate with me at all, and he expressed  
23 that.  
24 Q Did he know about the TRO at that point?  
25 A Yes, sir, he did.

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1 Q You didn't meet with people that were not  
2 your subordinates?  
3 A No, sir.  
4 Q Not one time?  
5 A Not on May 27th. Not -- not what he's  
6 referencing to after May 27th.  
7 Q What about prior to May 27th?  
8 A We're talking about May 27th.  
9 Q I'm talking about prior now.  
10 A No, sir.  
11 Q You never met with any subordinates -- you  
12 never met with any officers that were not  
13 your subordinates prior to May 27th, 2012?  
14 A What do you mean by "meeting"? Because I can  
15 encounter somebody in the hallway. Do you  
16 consider that a meeting?  
17 Q You know what I mean.  
18 A No, sir. I'm just asking.  
19 Q You just said you didn't meet with anybody  
20 after, so you knew what meeting was.  
21 Now, I'm asking you, did you meet with  
22 anybody before --  
23 A I'm saying I --  
24 Q -- and you're asking me explain what meeting  
25 is.

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1 Q All right. 409. May 27th, that's when you  
2 were gathering with Poiencot on non-Lafayette  
3 Police Department business? Is that what  
4 that gathering is referring to?  
5 A Where are you referring that to, Mr. Corry?  
6 Show me exactly where.  
7 Q Where you have your -- are you on 409?  
8 A Yes, sir. I'm on 409. Okay. Go ahead.  
9 Q Where you have the star.  
10 A Okay.  
11 Q Do you see where it says gathering? Is that  
12 the gathering that is being referred to  
13 there?  
14 A No, he never specified what gathering I'm  
15 prohibited, as far as who I should not talk  
16 to or not. That was just a general statement  
17 he made. So I don't know who he was  
18 prohibiting me from talking to.  
19 But if you go further down, if you start  
20 here, however, even after this directive,  
21 Lieutenant Cormier continued to participate  
22 in various meeting with officers, he doesn't  
23 say who, that were not his subordinates.  
24 Q Is that accurate?  
25 A No, sir.

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1 The same meeting that you were referring  
2 to after, I'm referring to before.  
3 A Okay. The meeting I'm referring to is the  
4 meeting in the context of what he wrote here.  
5 Meeting is a formal gathering where we are  
6 discussing some form of issue.  
7 Q Okay. Did you do that before May 27th of  
8 2012?  
9 A No.  
10 Q All right.  
11 A Could you go back?  
12 Q I don't need to. But if you need to, you're  
13 more than welcome.  
14 A Okay. Yes. We can go back.  
15 It says right here, here's where I was  
16 referring. The result of these meetings did  
17 not seem to have anything to do with the task  
18 or obligations for the units under his  
19 supervision or any other patrol support. I  
20 noted that Lieutenant Cormier never  
21 approached me about the content of these  
22 meetings, or results of these conversations  
23 in these meetings, or had no plans or  
24 presentations resulted in the meetings that  
25 were directed towards proactive activities in

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1 patrol support.  
2 That wasn't a requirement. And there  
3 was no meetings.  
4 Q There were never any meetings between you and  
5 Poiencot about recordings about IA documents  
6 that were taken out, that we've referred to  
7 as D-1? You never had those meetings with  
8 Poiencot? I think you told me earlier, you  
9 did.  
10 A Are you going to let me answer it, Mr. Corry?  
11 Q Yes or no, please.  
12 A Let me answer it. The meetings he's  
13 referring to is after May 27th, where  
14 apparently he found it an issue, which he  
15 never addressed it to me prior to that up  
16 until that point.  
17 Now, what you consider a meeting wasn't  
18 a meeting. I encountered him in the hallway,  
19 and a discussion happened.  
20 Q Okay.  
21 A Isn't that what I said?  
22 Since your own evaluations --  
23 Q I'm off of them now.  
24 A It would be inappropriate for me to refer  
25 back to a particular page in there, or are

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1 observation I was approachable, but he  
2 contradicts himself earlier. But -- were  
3 being recorded, retained and distributed to  
4 use against various police officers. And it  
5 is believed the majority of the recorded  
6 conversations were done without the consent  
7 of the officers being recorded.  
8 Q That's accurate, isn't it?  
9 A No, sir. I don't need to --  
10 Q Every -- right.  
11 A Go ahead.  
12 Q But the question was, the person that you  
13 were recording didn't know you were recording  
14 them.  
15 A No.  
16 Q I understand what you think the law is. But  
17 the question is, did the person that was  
18 being recorded know you were recording them?  
19 And the answer is what?  
20 A Mr. Corry, you're asking me --  
21 Q What is the answer? Yes or no?  
22 A You asked me two questions, and you  
23 intertwined them again.  
24 Your initial question was, is that  
25 accurate? And before I could respond, you

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1 you presiding over that?  
2 MR. SPRING:  
3 It's his deposition.  
4 A Yeah. That's why I'm asking.  
5 MR. CORRY:  
6 Q If you've got something you want to add.  
7 A Yes. GC-411. Down at the very bottom,  
8 you're going to see a star.  
9 Q Okay.  
10 A In my observation in dealing with Lieutenant  
11 Cormier, I found that he was approachable for  
12 myself, subordinates, and others, though  
13 there were a marked change in his ability  
14 when through the action of he and some other  
15 officers took, it was learned that Lieutenant  
16 Cormier was believed to be secretly and  
17 covertly recording conversation.  
18 Q That's accurate. Isn't it?  
19 A It was believed. You can't put beliefs in  
20 evaluation. If you refer to any evaluation  
21 manual, it's going to strictly prohibit you  
22 from doing it.  
23 That's why I had an issue with Captain  
24 Czajkowski, and I wanted to address these.  
25 But you also note, he said, it was my

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1 cut me off, and you gave me another question.  
2 Q Was it accurate?  
3 A Could you refer back to the first question?  
4 Q Was it accurate?  
5 A Which one?  
6 MR. CORRY:  
7 Read it to him, please, Debbie.  
8 (COURT REPORTER READS BACK PREVIOUS QUESTION)  
9 A But he asked me two questions.  
10 MR. CORRY:  
11 Q We can scratch the other one.  
12 A Why do you want to -- never mind.  
13 Q These e-mails back in 2011, that start out at  
14 423, 424, 425, that's regarding -- I think we  
15 talked about that yesterday, the duties of  
16 doing the payroll?  
17 A Were what? Which one you said?  
18 Q 423.  
19 A No, sir.  
20 Q What is 423?  
21 A 423 is a shining example of a document that  
22 contradicts what Captain Czajkowski was  
23 making notation in his evaluation.  
24 Q All right. 424 -- (Interrupted)  
25 A This is an e-mail from Captain Czajkowski

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1 regarding JD, the one he received the one-day  
2 suspension, where we're communicating and I'm  
3 apprising him of the status of the  
4 investigation, and he's giving me directions,  
5 as per Chief Craft, like I told you. So  
6 the --  
7 Q Okay.  
8 A -- the evaluation where you made reference to  
9 him saying when he was communicating with me,  
10 as far as the status update for the  
11 investigation with the letter of reprimand,  
12 that is not true. This is the example right  
13 here.  
14 Q All right. 426, the relocation of Our Lady  
15 of Lourdes goes 426 to 429?  
16 A Yes.  
17 Q What does that have to do with anything?  
18 A Back to the evaluation, again, would be not  
19 fair and objective. He put in the  
20 evaluation, apart from doing payroll and  
21 performing evaluation and investigations, I  
22 never prepared anything -- I mean, any other  
23 documents.  
24 Q You prepared 426 through 429?  
25 A Yes, sir. I'm sorry. I cut you off.

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1 tasked to do it.  
2 Q 435 through 437 is the patrol support  
3 lieutenant description?  
4 A Yes. And if you look in there, the duties of  
5 them, you don't see anything about responding  
6 for call for service in patrol.  
7 Also, if you notice, Mr. Corry, could  
8 you go back to it real quick?  
9 Q Yes.  
10 A Take notice of the person that authored this,  
11 Captain Dwayne B. Arceneaux. And you're not  
12 going to find any duties, or any task  
13 responsibility by Captain Czajkowski. He  
14 referred to Captain Dwayne Arceneaux, his  
15 predecessor.  
16 Q All right. 459 is the Special Order 12.1  
17 that we referred to yesterday regarding  
18 clandestine recordings, a two-page document,  
19 459 and 460. Is that accurate?  
20 A Yes.  
21 Q And then, 461 is another copy of the Internal  
22 Affairs standard operating procedures that  
23 goes through 518? Is that accurate?  
24 A No, sir.  
25 Q What does it go through?

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1 Yes, sir, I did.  
2 Q All right.  
3 A If you look at 427, you will see submitting  
4 officer.  
5 Q I saw that.  
6 A Yes.  
7 Q Okay. 433 is what you talked about earlier.  
8 I think you have a recording to go along with  
9 that. E-mail dated January 17th, 2012.  
10 A Yes. And if you notice, it even says here,  
11 if it can be established, it violates LPD  
12 general order, and LCG PPM regarding  
13 truthfulness in investigations. We will need  
14 to meet and discuss this issue to determine  
15 if those officers were held accountable. It  
16 never happened.  
17 Q All right. 434. That's that same  
18 investigation we referred to earlier?  
19 A Can you go back to it, please?  
20 Okay. You remember earlier during the  
21 deposition, we had a discussion about Bert's  
22 duties, and as far as he investigating his  
23 certain people and I investigating mine?  
24 This is the e-mail where it clearly shows he  
25 should have been doing it, but yet I was

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1 A According to your binder, 516.  
2 Q 560?  
3 A 16.  
4 Q 16.  
5 Okay. All right. And then, 517 and  
6 518, is that case regarding the city marshal.  
7 Did you have anything to do with that case?  
8 A No.  
9 Q Okay. Did you have anything to do with this  
10 Advocate report? Did you provide any  
11 information for this Advocate report --  
12 A No.  
13 Q -- that's contained in 517 and 518?  
14 A If you read that report, Mr. Corry, that  
15 report was -- the article was written from  
16 testimony that was taken in the court  
17 proceeding.  
18 Q Okay. I'm just asking, did you have any  
19 input in it?  
20 A No, sir. No, sir.  
21 Q And 519 is General Order 201.2; 519 through  
22 523?  
23 A Can we refer back to that GC-517?  
24 Q Is that in response to a question?  
25 A No, you can move on. I apologize.

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1 Q All right. General Order 201.2 is 519  
2 through 523, and that's professional conduct  
3 and responsibilities?  
4 A You said 519 and what?  
5 Q 523.  
6 A Yes.  
7 Q And General Order 301.9, internal  
8 investigations is 524 through 531?  
9 A Yes.  
10 Q And then, General Order department discipline  
11 is General Order 204.5 is 532 through 556 --  
12 or excuse me, 544?  
13 A Yes.  
14 Q All right. 545, that had nothing to do with  
15 you, did it?  
16 A Yes.  
17 Q It did?  
18 A It's a correlation, like I alluded to  
19 earlier, Heather Martin --  
20 Q Whoa, Whoa, Whoa. You've got to answer my  
21 question.  
22 Did GC-545, dated September 19th, 2008,  
23 have anything to do with you, AD-2008-005?  
24 A No.  
25 Q Okay.

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1 Q Okay.  
2 A And if you read the disposition letter, it  
3 says, it was considered a confidential  
4 document. And also --  
5 Q How did you get a copy of the disposition  
6 letter?  
7 A There was an envelope in my bin.  
8 Q Do you know who gave it to you?  
9 A No, sir.  
10 Q When did you get it?  
11 A I can't tell you the exact date, Mr. Corry.  
12 Q Before or after this lawsuit was filed?  
13 A The federal lawsuit or the --  
14 Q The federal lawsuit.  
15 A -- TRO?  
16 I'm not sure. I know it was before I  
17 was terminated, I can tell you that.  
18 Q What did you do with it?  
19 A With what?  
20 Q That document?  
21 A I kept it.  
22 Q Where is it?  
23 A Right here (indicating). It's a copy of it.  
24 But the original one is in my binder.  
25 Q Okay.

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1 A Will you let me finish?  
2 Q Yes. Go ahead.  
3 A Okay. AD-2008-005 was an investigation in  
4 which another white female officer was  
5 investigated for releasing a confidential  
6 document. And admitted to it, breaching a  
7 confidential document, and received a letter  
8 of reprimand.  
9 Q Was it a confidential -- was the confidential  
10 document something that she had generated, or  
11 something she had taken out of somebody  
12 else's file?  
13 A Something she took out of a report.  
14 Q Okay. Was it a document that she generated,  
15 or do you know?  
16 A It was a statement.  
17 Q That she had given?  
18 A Yes.  
19 Q Okay. That's different than taking a  
20 document out of somebody else's file, whiting  
21 it out and giving it to a Civil Service Board  
22 member.  
23 A No, sir.  
24 Q It's not?  
25 A It's not different. It's the same thing.

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1 A That they gave me, whoever it was.  
2 Q And you don't have any idea who that was?  
3 A No, sir.  
4 Q All right. 546?  
5 A I'm not finished with the document, Mr.  
6 Corry.  
7 Q Where is the signature page?  
8 A I don't know. If I'm not mistaken, let me  
9 see -- that particular document is -- it  
10 mirrors the one in which I was terminated.  
11 But Chief Craft authorized that  
12 investigation, not Dee Stanley. But same  
13 allegation, different discipline that was  
14 meted out. The only exception is Heather  
15 Martin never filed a lawsuit against the  
16 police chief like I did.  
17 Q Do you think any discipline was warranted?  
18 A That's it right here (indicating).  
19 Q What's that?  
20 A That's the second page, GC-559.  
21 Q So GC-559 is the second page behind GC-545?  
22 A Yes.  
23 Q Do you feel like any discipline was warranted  
24 in what you did?  
25 A No.



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1 Q All right. GC -- (Interrupted)

2 A Will you let me expound on that?

3 Q Sure, if you want to.

4 A Okay. First of all, I didn't think I did

5 anything wrong. It was an issue that I was

6 discussing the policy or whatever. And I

7 just made someone aware of a potential

8 problem that the city was going to have down

9 the road.

10 Now, if that's an issue they feel that

11 it's going to disrupt the interworkings of

12 the police department for me trying to

13 prevent them from having an issue by them not

14 being aware that there's an document that

15 actually compels them to do something and

16 they weren't doing it, then I don't know what

17 to tell you.

18 Q All right. GC-546, what is that?

19 A It's an e-mail from Chief Craft that he

20 disseminated out to all officers apprising

21 them there's going to be a fundraiser at City

22 Bar.

23 Q For?

24 A Joel Grayson.

25 Q Was he the one that killed?

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1 the Marine Corps League.

2 Q 547, what is that for?

3 A February 19th is the date.

4 Q Actually, it's February 17th, is it not? The

5 date of the e-mail?

6 A No, sir. I'm not referring to the date of

7 the e-mail.

8 Q Okay.

9 A I'm referring to the contents of the e-mail.

10 Q All right.

11 A Effective Sunday, February 29th, Bert

12 Bejsovec -- basically, it's an official

13 notice that he's going to start doing his

14 responsibilities that he should have been

15 doing from the onset. After multiple

16 complaints to the captain, and the major,

17 they finally decided. And you had reference

18 if I had any documentation to verify that,

19 and that's it.

20 Q All right. So they addressed your concern?

21 A Months -- several months later.

22 Q All right. That's a yes?

23 A Yes. They addressed it even after I was

24 inundated with work. That, if you notice the

25 date, February 19th -- go back to it -- it's

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1 A Yes.

2 Will you let me finish?

3 Q Sure.

4 A The same individual that owned City Bar, I

5 issued him a summons. Chief Craft had this

6 big thing about officers establishing a

7 relationship with bar owners because it would

8 clog their judgment if they would ever be

9 called to respond to a call at that

10 establishment. And he basically prohibited

11 officers from establishing some type of

12 relationship with them.

13 Thereafter, he condones a fundraiser at

14 this bar where this individual that violated

15 the law, and found it okay.

16 Q Well, he was -- he was actually raising money

17 for an officer's widow, was he not? Is that

18 what the purpose of the e-mail was for?

19 A Yes, but --

20 Q Did you donate to it?

21 A To what?

22 Q To the cause for Joel Grayson?

23 A I sure did. I donated to it because I'm

24 familiar with Joel Grayson's father. He was

25 an officer in the Marine Corps, and he was in

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1 after they filed on a complaint on me for the

2 60-day violation of me not completing an

3 investigation. So they were trying to

4 make-up for it.

5 Q The one you didn't appeal?

6 A Yes.

7 Q All right. 551 and 552, that was the July

8 7th, 2011 transfer. Did that involve you?

9 A No.

10 Q Okay. 553?

11 A Will you let me explain the purpose of it?

12 Q Sure.

13 A Okay. The purpose of it is, it shows when

14 Captain Czajkowski and Major Randy Vincent

15 came to patrol support, and how long they

16 were there. There was no issues up until

17 after the lawsuit was filed.

18 Q All right. What lawsuit are you referring

19 to?

20 A The TRO.

21 Q That's the one where you were trying to stop

22 the investigation that you were ultimately

23 terminated for, that TRO?

24 A Yes.

25 Q Okay. 553, this is where there's the -- what

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1 is this for? Is this when you were promoted?  
2 A No, sir.  
3 Q What is 553?  
4 A 553?  
5 Q Yes.  
6 A It's not a promotional e-mail.  
7 Q Okay. What is it?  
8 A It's an e-mail designating the time entry  
9 designee, which I am, that's the acronym,  
10 TED, what you see, T-e-d. The purpose of it  
11 is to show how many people I was doing  
12 payroll for.  
13 Q All right.  
14 A Inclusive of, if you notice -- go back,  
15 please. 553, look at number 2.  
16 Q Bert Bejsovec.  
17 A Exactly.  
18 Q So you were a senior? You had been at the  
19 police department longer than he had?  
20 A No, sir.  
21 Q All right. 555, what is that for?  
22 A Mr. Corry, there's a -- the top sheet to this  
23 is missing.  
24 Q Well, maybe we'll find it when we go through.  
25 All right. 558, dated September 18th,

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1 Q Let's move to stack three that we got on  
2 April 1st. 578, does this have anything to  
3 do with you?  
4 A Yes.  
5 Q What?  
6 A It's something we allege in the lawsuit.  
7 This deals with Paul Taylor, black officer.  
8 Q I'm sorry?  
9 A Paul Taylor, black officer, where he publicly  
10 humiliated him when he was at the front desk  
11 position. All previous sergeants that were  
12 front desk sergeants never had to post his  
13 desk outside the police department. And  
14 basically, he put him in time out.  
15 Q Is Paul Taylor a party to the lawsuit?  
16 A Currently?  
17 Q Yes.  
18 MR. SPRING:  
19 Not now.  
20 A I don't know. I can't answer that question,  
21 Mr. Corry.  
22 MR. CORRY:  
23 Q All right.  
24 A But the reason I reference it is to show  
25 despaired treatment, black officers versus

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1 2008, that has nothing to do with you, does  
2 it?  
3 A (No response.)  
4 Q You weren't involved in that investigation,  
5 were you?  
6 A No.  
7 Q Where did you get a copy of this from, Novey  
8 Stelly?  
9 A No, sir. Will you let me answer the  
10 question? It was in the envelope, the same  
11 envelope that had the Heather Martin.  
12 Q Was there anything else in that envelope?  
13 A I can't remember. There were numerous  
14 occasions, Mr. Corry, they would put stuff in  
15 my bin when I would show up for work.  
16 Q All right. Let's look at the documents 578  
17 through 682, that you gave us this morning.  
18 MR. CORRY:  
19 And if you want to take a smoke  
20 break.  
21 MR. SPRING:  
22 Yes, please.  
23 (SHORT BREAK TAKEN FROM  
24 2:37 P.M. TO 2:49 P.M.)  
25 MR. CORRY:

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1 white.  
2 Q You've got something blacked out to and from.  
3 Who is it from?  
4 A I don't know.  
5 Q Where did you get this?  
6 A In the bin -- in the envelope.  
7 Q All right.  
8 A Not the same envelope, though.  
9 Q A different envelope. How many envelopes  
10 have you received?  
11 A Mr. Corry, I couldn't give you a number.  
12 Q Well, you're going to have to.  
13 A I can't give you an exact number. I can't  
14 say ten, 20, whatever. There were several,  
15 and it was over extended periods, so --  
16 Q More than five?  
17 A Oh, yes. Yes.  
18 Q More than ten?  
19 A I don't know. It could be or it could not.  
20 Q Are there any documents contained in those  
21 envelopes as you've described that have not  
22 been produced to us?  
23 A As part of discovery?  
24 Q Yes.  
25 A The overall discovery?

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1 Q Yes.  
2 A No. Everything that was in the documents I  
3 gave.  
4 Q All right. Number 579, what does this prove,  
5 if anything?  
6 A Light duty, special accommodations.  
7 Q Were you ever placed on light duty?  
8 A No, sir.  
9 Q Okay. So is there any claim about light duty  
10 as it relates to you, Greg Cormier, have  
11 anything to do with this lawsuit?  
12 A No.  
13 Q Okay. 580, what does this have to do with  
14 anything?  
15 A We got a serious tongue lashing for this  
16 e-mail, as well as Novey. Well, Novey Stelly  
17 was -- got the brunt of it because he put in  
18 there -- but there was one of Chief Craft's  
19 directives, one of his major case, put out an  
20 e-mail and disseminated through his chain.  
21 The only issue was, the victim in this crime  
22 was his illegitimate son. And then --  
23 Q Okay. So this is bringing a third party  
24 that's uninvolved in the lawsuit into the  
25 lawsuit, which Judge Hanna has previously

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1 Q Okay. Does it support your allegations in  
2 your lawsuit?  
3 A Yes.  
4 Q How?  
5 A That he got upset because he found out about  
6 the e-mail.  
7 And look at the date, March 9th, 2012.  
8 There were some reprisals thereafter.  
9 Q All right. 581.  
10 What were the reprisals, did they affect  
11 you?  
12 A Yes, sir.  
13 Q What?  
14 A Transfers.  
15 Q When were you transferred?  
16 A May.  
17 Q Pardon?  
18 A May.  
19 Q All right. 581, how does that support the  
20 allegations you made in the lawsuit?  
21 A It supports the corruption, lack of  
22 truthfulness. Initially, Chief Craft had had  
23 a meeting in Compstat, and he had basically  
24 said that his weapon was left in his vehicle  
25 at a chief conference in Lake Charles, and

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1 said he didn't want to have happen. Is that  
2 what this shows, 580?  
3 A I don't know if that's what it shows. That  
4 wasn't my intention.  
5 Q Okay. Were you involved in the incident from  
6 Novey Stelly? Because it says March 9th,  
7 2012, to Ned Fowler, cc Norbert Myers and  
8 Novey Stelly. I don't see where you're  
9 involved with it.  
10 Did you have anything to do with this  
11 incident as described by Stelly?  
12 A No. As far as working --  
13 Q Okay. It was just forwarded to you by Gabe  
14 Thompson?  
15 A Yes.  
16 Q And it was forwarded to you and Scott  
17 Poiencot, by Gabe?  
18 A Yes. And Novey Stelly forwarded it to Gabe,  
19 because Gabe was the precinct administrative  
20 lieutenant.  
21 Q Okay. Does it show anything pertinent to the  
22 allegations you've made in the lawsuit, or is  
23 it just simply an attack on this  
24 individual?  
25 A I wouldn't say it's an attack.

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1 that Lake Charles Police Department was --  
2 Q Do you know that for a fact, or is that  
3 something that was told to you?  
4 A It came from Chief Craft's mouth. He said  
5 it. Now, you can't get any better than  
6 coming from the original person.  
7 And he said that they were looking for  
8 video footage and unable to identify the  
9 subject that had taken his weapon. And --  
10 Q Go ahead.  
11 A And he had negligently left his weapon in the  
12 vehicle and someone had taken it.  
13 Later on, he files a report, in which  
14 Sean Arwood is the person that took the  
15 report, and he -- he now had claimed that it  
16 was taken from his residence.  
17 Q Is it a violation of a state statute to  
18 disclose a police officer's home address? Do  
19 you know that?  
20 A (Witness shakes head negatively.)  
21 Q You've got to answer.  
22 A No.  
23 Q You don't know?  
24 A No.  
25 Q Is this --

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1 A And his address --  
2 Q -- a confidential document?  
3 A Hold on a second. His address is not on  
4 there.  
5 Q The street is.  
6 A You said his address. You said the street.  
7 MR. SPRING:  
8 What are you on?  
9 MR. CORRY:  
10 I'm on 581.  
11 A 581.  
12 MR. SPRING:  
13 Okay.  
14 A An address would be an numerical address.  
15 Let's say, 599 Wood Duck. That's not what it  
16 says.  
17 MR. CORRY:  
18 Q Okay. I'm just asking you if you're aware  
19 that disclosing a police officer's home  
20 address is a violation of state statute. Do  
21 you know that? Yes or no?  
22 A No.  
23 Q You don't know?  
24 A No, I don't know if it's a violation. But --  
25 Q Is this a confidential document?

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1 officers versus white officers in  
2 preferential treatment. That's why it's in  
3 here. And it's an example to show that this  
4 officer -- he wasn't even confirmed a police  
5 officer, he was in training, and they gave  
6 him -- they afforded him the opportunity to  
7 be placed on light duty. Where you had  
8 officers that were confirmed, sergeants that  
9 were black, that were sent home. This guy  
10 was afforded special accommodations where he  
11 worked at the police department and was paid  
12 his regular salary as opposed to an officer  
13 that was confirmed that was black.  
14 Q Who?  
15 A The particular officer?  
16 Q Yes. Which officer are you -- (Interrupted)  
17 A Sergeant Mike Brown, Sergeant Paul Taylor.  
18 Q No. Which officer are you referring to in  
19 this 582? I don't see anything on there  
20 about light duty.  
21 A PO Randy Guidry. If you look on this  
22 training officer, light duty due to an  
23 injury, FTO. He broke his arm.  
24 Q Okay. All right. 583, we've talked about.  
25 A No, we didn't actually talk about it. It was

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1 A No.  
2 Q All right. 582.  
3 A Let me explain why it's not confidential,  
4 though. If it's confidential, it wouldn't be  
5 disseminated throughout the department.  
6 Confidential document is something  
7 that's kept within a certain area.  
8 Q 582, what does that prove? Memo dated  
9 November 23rd, 2010.  
10 A That the officer was afforded light duty in  
11 initial phase training.  
12 Q You don't have any allegations in your  
13 lawsuit relative to light duty as they  
14 pertain to you, do you?  
15 A No.  
16 Q Okay.  
17 A Let me finish, Mr. Corry.  
18 The reason it's in there is because that  
19 officer is a white officer. And black  
20 officers weren't afforded that opportunity.  
21 Now, I have that in the lawsuit.  
22 Q But light duty was never an issue for you,  
23 was it?  
24 A I'm not talking about light duty. The reason  
25 it's in there is making reference to black

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1 submitted afterwards, and you said you was  
2 going to discuss that further down the  
3 line.  
4 Q Okay. That's with the payroll, the alleged  
5 payroll fraud that you -- the complaint you  
6 filed, this went with it?  
7 A Yes. And the purpose I submitted that was,  
8 Dwayne Arceneaux was submitting his times as  
9 opposed to Lieutenant Bert Bejsovec. But in  
10 Mr. Domingue's report, he said -- let me  
11 don't paraphrase it. I'll read it exactly.  
12 Q I don't necessarily need to go back to that.  
13 We know the results.  
14 A No, sir. I need to go back there because I  
15 want to make reference to why this is  
16 relevant. Because it shows there was a cover  
17 up in the investigation, and that they had  
18 formed a defense for Bert Bejsovec, and it  
19 wasn't thoroughly investigated.  
20 Q That's your opinion. That's your opinion?  
21 A No, it's not my opinion. It's still pending,  
22 in which they're going to make a decision on  
23 it. But there's a stay order put in place.  
24 Q Okay. 584, that's the misdemeanor summons  
25 you talked about earlier? Is this a public



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1 record, 584 and 585?  
2 A The summons?  
3 Q Yes, sir.  
4 A Yes, sir, it is.  
5 Q All right. And 586, is that a public record?  
6 A Which one?  
7 Q 586.  
8 A I don't know.  
9 Q Did you get Mr. Hargrave's permission to  
10 disclose this?  
11 MR. SPRING:  
12 I'm going to object. I do think it  
13 was disclosed --  
14 A Yes, it was.  
15 MR. SPRING:  
16 -- in the mandamus that had been  
17 filed earlier.  
18 MR. CORRY:  
19 I'm just asking him. Your  
20 objection is noted.  
21 MR. CORRY:  
22 Q Did you?  
23 A No.  
24 Q All right. 587. That's just the ordinance?  
25 A Yeah. That was an ordinance to prove that

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1 was transferred to the power squad in the  
2 wake of the Glen Dartez ordeal, in which they  
3 retaliated against me for -- under their  
4 belief that I was responsible for reporting  
5 misconduct. I was transferred to the power  
6 squad.  
7 When I mentioned I reported in uniform  
8 to -- as a power squad sergeant, Captain  
9 Arceneaux summoned me to his office, and told  
10 me I wasn't in proper attire. And he told me  
11 reporting tomorrow, that I need to report in  
12 plain clothes because I would be assigned to  
13 the cold case file.  
14 Later, before he retired, Captain  
15 Arceneaux gave me a packet inclusive of this  
16 letter. The -- I don't know if you want me  
17 to get to it now or you're going to get to it  
18 later.  
19 Q That's fine. We can get to it.  
20 A Okay. As well as the --  
21 Q 673?  
22 A -- 673, 674, 676, 677, 678, 679, 680.  
23 Q All right. What does that show?  
24 A Hold on one second. There's one more. As  
25 well as 583.

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1 the -- I had probable cause to issue him that  
2 summons.  
3 Q All right. And 588 and 589 is the personal  
4 action request that the board took up, I  
5 think at the last meeting, actually.  
6 Is that what that is, a blank personal  
7 action request, 588 and 589?  
8 A It's a personal action form, not request.  
9 Q I'm sorry, form.  
10 That's what that is, the front and back?  
11 A Yes, sir.  
12 Q All right. 590, what is that?  
13 A That is a letter that was sent to retired  
14 Captain Dwayne Arceneaux.  
15 Q Was it sent to some other officers?  
16 A No, sir.  
17 Q Just him?  
18 A Yes, sir.  
19 Q And who sent it?  
20 A I don't know.  
21 Q And what does it have to do with your  
22 lawsuit, the allegations you made in your  
23 lawsuit?  
24 A Well, what it has to do with that is, Captain  
25 Arceneaux, when I alluded to earlier, when I

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1 He gave me an entire packet. And like I  
2 said earlier, I guess he had an epiphany, and  
3 he wanted to extend an olive branch to people  
4 that he felt that he had wronged. And he  
5 produced that letter.  
6 And he was upset, because he said,  
7 basically in the letter that was given to him  
8 was indicative of his career at the police  
9 department. And he cautioned me, he said  
10 that they were coming after me because I  
11 filed a complaint against Bert Bejsovec.  
12 And there's a recording that -- between  
13 Captain Arceneaux and myself. I don't know  
14 if -- I think Uletom Hewitt submitted that or  
15 not, in which he indicates in the onset of  
16 the recording that Mark Francis, as well told  
17 him that they're coming after Greg. And that  
18 was on the heel of me filing a complaint  
19 against Bert Bejsovec.  
20 He told me to be careful of Jackie  
21 Alfred, that he was nothing but a tool for  
22 Chief Craft to do his dirty work, and that  
23 they were going to start a paper trail in  
24 order to terminate me. And any investigation  
25 that they could garner, they were going to

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1 utilize to fire me down the line.  
2 Q Was that before or after you had taken that  
3 document out of that file and whited it  
4 out?  
5 A That was after.  
6 Q After you had done that?  
7 A Yes.  
8 Q All right. 591?  
9 A I'm not finished, Mr. Corry.  
10 He also said that -- and this came from  
11 Scott Morgan as well. He also said that Dee  
12 Stanley personally told Jackie Alfred, as  
13 well as Chief Craft in a meeting -- I don't  
14 know if it's -- because I didn't try to get  
15 any clarity with him, as far as if it was the  
16 same meeting, where it was the defense  
17 meeting or not. But he said personally that  
18 he was going to take care of me for filing a  
19 complaint with civil service and airing out  
20 the department's dirty laundry, and also  
21 embarrassing Bert Bejsovec, as well as his  
22 wife, who works at city hall in the IT  
23 section.  
24 Q All right.  
25 A And he said that -- be careful, because

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1 did here on a separate investigation, which  
2 shows that there was none never done on JD  
3 for the 60 days, because he didn't know who  
4 was -- who was conducting the investigation.  
5 Q All right. 596, 97 and 98, does that have  
6 anything to do with you?  
7 A (Witness examines documents.)  
8 Q It looks like a sheriff's department maybe  
9 golf tournament, or something, announcing the  
10 winners. Does that have anything to do with  
11 you, 596, 97 and 98?  
12 A That was given to me by Captain Arceneaux to  
13 show preferential treatment.  
14 Q How does the Lafayette Parish Sheriff's  
15 Office golf tournament show preferential  
16 treatment?  
17 A Because they were playing golf on company  
18 time.  
19 Q How do you know that? You have their payroll  
20 records?  
21 A He submitted me his payroll record.  
22 Q Who did?  
23 A This is Captain Arceneaux. He gave me his  
24 payroll sheet.  
25 Q So he got paid to play golf?

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1 they're probably going to fire you somewhere  
2 down the line.  
3 Q All right. 591 and 592, I guess that has  
4 something to do -- and 593 has something to  
5 do with off duty security at the bars. Your  
6 lawsuit doesn't have anything to do with  
7 that, does it?  
8 A No, sir.  
9 Q All right. 594, we've already discussed, it  
10 was copied earlier.  
11 595, what does that show?  
12 A Remember I referred to you as far as Keith  
13 Gremillion being the custodian of Internal  
14 Affairs?  
15 Q Right.  
16 A And actually, it's insuring that the  
17 investigation is conducted with the 60-day  
18 time frame according to SOP and policy. He  
19 e-mails the shift captain, as well as the  
20 person investigating the shift level  
21 investigation, will get a 30-day status  
22 update, in order to find out --  
23 Q And that's what he did here?  
24 A Yes.  
25 Will you let me finish? That's what he

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1 A If you look at the dates.  
2 Q Is Captain Arceneaux a defendant in this  
3 lawsuit? Did you sue him?  
4 A No, sir.  
5 Q He's black, isn't he?  
6 A Yes. But the same race discrimination is --  
7 Q All right.  
8 A -- where you can discriminate against black.  
9 You were asking the question if he  
10 was playing on company time.  
11 Q Yes.  
12 A Do you want me to answer that?  
13 Q Yes.  
14 A That's hard to see on this copy. Let me get  
15 the original. April 29th.  
16 Q Where are you getting that date from?  
17 A Right here (indicating). His payroll  
18 sheet.  
19 Q I didn't see a date on the -- (Interrupted)  
20 A April 29th. You can -- if you want to  
21 archive. You want to get with the Lafayette  
22 Sheriff's Department?  
23 Q I don't see a date on 596, 597 --  
24 MR. SPRING:  
25 599, there is.

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1 MR. CORRY:  
2 Q -- or 598. Is there a date on there?  
3 A Hold up.  
4 Q Simple question. Is there a date on it?  
5 A No. On which form?  
6 Q The ones I just mentioned.  
7 A Which ones you just mentioned?  
8 Q 596, 97 and 98.  
9 A (Witness examines documents.)  
10 Q Other than at the bottom of 597, it says  
11 August 25th, 2011. And it says, August 25th,  
12 2011 on 598. And the documents you provided  
13 of 599 and 600, don't have that date on them.  
14 A No.  
15 Q All right. 601, what is that for? You're  
16 asking the board chairman for a copy of a  
17 statute?  
18 A No. Not only a copy of a statute. There was  
19 a conversation -- there was a discussion  
20 about the administrative leave dealing with  
21 Uletom Hewitt, in which the board president  
22 referenced Chief Craft coming to the board in  
23 May of that year, June and July, for an  
24 extension of administrative leave, and which  
25 that never occurred. Chief Craft wasn't even

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1 A Okay. Everyone knew at the police department  
2 that it was useless to go to Reginald Thomas  
3 with any civil service issue because he would  
4 either give you guidance that wasn't  
5 according to -- to the applicable laws  
6 governing civil service.  
7 Q All right. 602 and 603, does that have  
8 anything to do with the allegations you made  
9 in the lawsuit?  
10 A (Witness examines his documents.)  
11 Q Or are we bringing someone into the lawsuit  
12 that's a third party and not involved?  
13 A Which number?  
14 Q 602.  
15 A Give me the question again.  
16 Q Does this have anything to do with -- 602 and  
17 603, does that have anything to do with the  
18 allegations you've made in the lawsuit?  
19 A No. That was in the stack.  
20 Q All right. Why is it in there?  
21 A I don't know.  
22 Q What?  
23 A I can't answer that question.  
24 MR. SPRING:  
25 Is it a mistake?

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1 present for the May hearing.  
2 And he also cited RS 33:2557, which he  
3 entitled leave of absence. And I couldn't  
4 find it. And I was e-mailing him to --  
5 Q Why did you contact the board president,  
6 instead of contacting the police officer  
7 representative?  
8 A Because it was Reginald Thomas.  
9 Q Okay.  
10 A He's not proficient in civil service  
11 issues.  
12 Q Even though he was the board representative  
13 for years?  
14 A Anytime --  
15 Q Is that -- you have to say yes?  
16 A Yes. Anytime --  
17 Q And he was elected by the police  
18 department?  
19 A Mr. Corry, will you let me respond? You cut  
20 me off. I give you an initial answer, and  
21 then you cut me off before I can elaborate.  
22 Q All right.  
23 A Will you let me -- you'll afford me the  
24 opportunity to respond?  
25 Q Yes.

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1 A Yes. Other than a mistake.  
2 MR. CORRY:  
3 Q I'm sorry?  
4 A Other than a mistake, there's a few things in  
5 there that shouldn't be in there, like --  
6 Q All right. 604, that's a statute?  
7 A Yeah. That -- that shouldn't be in there.  
8 605 as well.  
9 MR. SPRING:  
10 Do you want to excise 602 and 603,  
11 put a note on them?  
12 A And 606. And that one, too.  
13 MR. SPRING:  
14 A This one, too, shouldn't be in there. 606.  
15 MR. SPRING:  
16 60-what?  
17 A 606.  
18 MR. CORRY:  
19 Q All right. 611, where did you get a copy of  
20 this?  
21 A That's disseminated throughout the police  
22 department.  
23 Q Does it have anything to do with the  
24 allegations in your lawsuit?  
25 A Hold on one second. (Witness examines

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1 document.)  
2 Yes. It shows when Mr. Ottinger was  
3 stepping down and Chief Craft had testified  
4 that -- when the question was posed to him  
5 concerning -- saying that I released  
6 confidential information with JD, and he had  
7 did the same with BR -- and I'll say BR,  
8 although he mentioned the guy's name in court  
9 -- that he had mentioned that he had got the  
10 advice of City Attorney Michael Hebert, when  
11 it was actually Pat Ottinger. That's the  
12 only reason that's in there.  
13 Q All right. 614 and 15. It looks like some  
14 kind of letter from Paul Marx. Did you have  
15 anything to do with the contents of this  
16 document? Did you provide any information in  
17 614 or 615?  
18 A Any input? Is that a question you're asking  
19 me, sir?  
20 Q Yes.  
21 A No, sir.  
22 Q 616, where did you get that?  
23 A Ricky Rees gave it to me.  
24 Q All right.  
25 A And the reason he gave it to me, or the

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1 white officers.  
2 This article was the incident in which,  
3 like I alluded to earlier, yesterday, I want  
4 to say, in which Greg Randell received a  
5 five-day suspension in which he appealed it,  
6 and you represented the city. And Stephen  
7 Bajat conducted a follow-up investigation  
8 after this gentleman here, in Exhibit GC-620,  
9 was willing to provide information on other  
10 faculty members at Acadiana High that was  
11 pretty much doing the same thing, having  
12 inappropriate relationships with students.  
13 He started the investigation without  
14 even verifying if there was a crime that  
15 actually occurred. He went and did a  
16 non-custodial interview with this lady,  
17 Ms. Elizabeth Savoy.  
18 Q Is this public record that you're talking  
19 about, or is this something that's private?  
20 A What?  
21 Q What you're talking about right now.  
22 A I don't know what you want to determine as  
23 public record or private.  
24 Q Well, I don't know. I mean, the judge has  
25 made it very clear, he doesn't want third

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1 reason I kept it is, Ms. Prejean had  
2 testified that she had no knowledge of this  
3 letter being authored by Mr. Marx. But yet  
4 she disseminated it through the people in the  
5 police department. And Ricky had some  
6 concerns, and he came to me with the letter.  
7 And I said, you better not be disseminating  
8 that letter or attaching your e-mail and  
9 forwarding it to other people, because  
10 there's a general order that governs you,  
11 utilizing police department, or LCG equipment  
12 for purposes unintended to work relations.  
13 Q All right. And 616, 617, 618 and 619, did  
14 you have any input in the contents of that  
15 document?  
16 A 617, 618, and what's the number?  
17 Q 619.  
18 A (Witness examines documents.)  
19 No, sir.  
20 Q And 620, did you have any input in this news  
21 story?  
22 A No, sir.  
23 Q What does that have to do with anything?  
24 A Despaired treatment. Black officers get  
25 discipline heavy handed by the chief versus

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1 parties brought into this lawsuit that don't  
2 have anything to do with it.  
3 A Well, it has something to do with it. It  
4 shows preferential treatment as far as how  
5 black officers are disciplined differently  
6 compared to white, and they are heavy-handed  
7 with Chief Craft meting out discipline  
8 compared to white officers.  
9 Q Let me ask you this --  
10 A Okay.  
11 Q -- you and Scott Poiencot were both fired  
12 because of the investigation arising out of  
13 AD-2012-007, were you not?  
14 A Yes.  
15 Q He's a white officer, and you're a black  
16 officer, correct?  
17 A Yes.  
18 But let me go back to GC-621.  
19 Q All right. Well, before you do that, I want  
20 to ask you. Is GC-621 through 626 a matter  
21 of public record?  
22 A 621 and 626?  
23 Q Yes.  
24 A (Witness examines documents.)  
25 626, it appears that came off of a



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1 website. 621 --  
2 Q Are those all related to each other?  
3 A Yes, sir, it is.  
4 621 to 625, I would say no.  
5 Q Okay.  
6 A I would also add, I never released that  
7 document to anyone in order to make it a  
8 public record.  
9 Q You produced it in discovery?  
10 A I'm producing it now.  
11 Q You sure did.  
12 All right. The last thing is 681 and  
13 682. Does that involve you?  
14 A (Witness examines document.)  
15 I think I addressed that already, Mr.  
16 Corry. And no, it doesn't.  
17 And is reason I submitted that was to  
18 show when Captain Ron Czajkowski and Randy  
19 Vincent came to the patrol section.  
20 Q All right. And 683 is just another copy of  
21 the same thing. I'm looking at the stack  
22 that we got this morning, that you actually  
23 left here yesterday.  
24 A I don't have 683.  
25 Q You should. Right here (indicating).

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1 of Major Alfred and how he treats black  
2 officers, and how he goes above and beyond to  
3 publicly embarrass them in their  
4 decision-making.  
5 And as well as, he'd go out of his way  
6 to be Police Chief Jim Craft's whipping boy.  
7 When they're meting out discipline, black  
8 officers were -- they'd camouflage it, where  
9 it's not directly coming from Police Chief  
10 Jim Craft.  
11 And he said if you go back and look at  
12 most of the documents dealing with  
13 predetermination notices and notices of  
14 investigations, as well as discipline  
15 letters, you're going to have Major Alfred as  
16 the person's signature, and under there, the  
17 chief designee.  
18 Q All right. Let's look at your supplemental  
19 responses that you gave us.  
20 561, that will be in --  
21 A All right.  
22 Q Look at 561.  
23 A (Witness examines his documents.)  
24 Q Got it?  
25 A Yes.

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1 A Oh.  
2 Q That's the same thing we just talked about,  
3 683 and 84, correct?  
4 A Yes.  
5 Q 685, we've talked about.  
6 And 686, 87 and 88, 89, 90 to 93, we've  
7 talked about.  
8 A No, sir, we didn't.  
9 Q Well, you've referenced them earlier with  
10 Dwayne Arceneaux.  
11 A You never let me finish.  
12 Q Go ahead and finish.  
13 A The reason he gave me all of this is he was  
14 upset with me, and he was under the  
15 assumption that I was responsible for these  
16 documents.  
17 Q Do you deny you were?  
18 A I didn't have to deny it, because when he  
19 gave them to me, he basically told me, I know  
20 you didn't do it.  
21 Q I'm asking you. Did you do it?  
22 A No.  
23 Q Okay.  
24 A And he -- the documents 686 through 687, he  
25 basically said that this story was indicative

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1 Q Do you see the witnesses down there at the  
2 bottom?  
3 A Yes.  
4 Q I know we've talked about a lot of these  
5 people, so I just want to make sure that we  
6 covered everything there was to cover, and  
7 the reason you listed them.  
8 Joey Provost. That's the polygraph  
9 incident?  
10 A Yes.  
11 Q Anything else?  
12 A When you're referring to the polygraph  
13 incident, you're referring to the whole  
14 entire incident?  
15 Q Yes.  
16 A Yes. And that's inclusive of --  
17 MR. CORRY:  
18 You got that, Hallie.  
19 MR. CORRY:  
20 Q I'm sorry.  
21 A I'm not finished, Mr. Corry.  
22 Q Go ahead.  
23 A That's inclusive of the complaint that I  
24 filed, too. Are you encompassing all of  
25 that?

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1 Q Yes.

2 A Okay. Yes.

3 Q Is there anything that we haven't talked

4 about that relates to Joey Provost? I think

5 we've covered it, but --

6 A No, not really. When I touched on it and you

7 cut me off and veered off of it.

8 Q All right. I don't want to cut you off.

9 A Well, when I tried to establish that dealing

10 with CVSA's and polygraph, and that his

11 credibility was at issue because he was

12 basically deemed being untruthful. I -- I

13 don't know why you would utilize this person

14 to conduct a polygraph thereafter.

15 Q All right. Keith Gremillion?

16 A You asked me why he's there?

17 Q Yes.

18 A He's there as a witness, number one, to

19 identify -- first of all, he conducted his

20 own investigation. And that was from the

21 testimony which you deposed him on March 8th,

22 in which he started an investigation on his

23 own, which was without authorization from the

24 police chief. And that's according to --

25 Q That has to do with the Mclean document?

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1 dirty laundry in the general public and walk

2 away without anything happening to you. And

3 this was in the wake of the Bert Bejsovec

4 payroll fraud complaint in April.

5 Also, we need to identify from him who

6 were the participants in this meeting at city

7 hall on the Wednesday in which they were

8 forming a defense.

9 We also need to find out what he meant

10 by forming a defense. Because there was an

11 audio recording with he and Gabe Thompson, in

12 which they discussed the payroll issue. And

13 particularly, the overtime slip in which he

14 -- he made the statement that he was going to

15 chop Ron Czajkowski ass when all of this is

16 over with, because he shouldn't have approved

17 that overtime slip in the absence of not

18 filling in the times.

19 Q Is that the recording that was played for the

20 TRO?

21 A You asked me that already, Mr. Corry. I

22 can't tell you all the contents of that

23 recording.

24 Q Do you know if the recording has been

25 produced?

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1 A Yes, sir.

2 Q Anything else?

3 A Yes. Hold on one second.

4 General Order 204.5, under departmental

5 discipline, section 3.6. No employee will

6 institute an independent investigation on any

7 other employee or any public official without

8 first obtaining authorization from the police

9 chief.

10 Q All right.

11 A That investigation which he started to

12 identify the document, he conducted on his

13 own.

14 Q All right. Jackie Alfred?

15 A I'm not finished.

16 Q Oh, okay.

17 A As well as identifying when did he receive

18 the document and when he started his

19 investigation.

20 Q All right.

21 A That's Keith Gremillion.

22 Q Okay. Jackie Alfred?

23 A Why he's a witness? We need to identify --

24 well, on several issues. What he meant by,

25 you cannot air out the police department

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1 A It should have.

2 Q Do you know?

3 A Yes.

4 Q You do?

5 A That it was produced?

6 Q That it was produced to us.

7 A Yes. That should be part of Scott Poiencot's

8 audio file.

9 Q All right. Anything else on Jackie?

10 A Why he was the designee for the chief of

11 police in the notice of investigation of

12 AD-2012-007, as opposed to Chief Craft. And

13 how many other times has he stepped in for

14 the chief, and why the chief wasn't there to

15 do his responsibility as authorized in an

16 investigation. That should be it.

17 Q All right. Pat Pattum?

18 A Pat Pattum conducted an investigation on the

19 unauthorized press release in which I never

20 received a disposition letter on it.

21 Q Okay. Gabe, I think we've covered him. I

22 deposed him. I know what he's going to say.

23 Norbert?

24 A You don't know why Norbert was listed?

25 Q Yes. Why is he listed?

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1 A Well, he's listed to testify or to pretty  
2 much verify pretty much all of our claims,  
3 starting with the unfair treatment for blacks  
4 versus white officers, to investigations  
5 being conducted by the --  
6 Q You're aware he got dismissed from the  
7 lawsuit by the Court, aren't you?  
8 A Yes.  
9 Q Okay.  
10 A As well as -- as well as the retaliation that  
11 Chief Craft meted out on him when he  
12 disagreed with him. And it all started over  
13 a disagreement over an officer in the way he  
14 investigated an investigation.  
15 He's also going to be a witness to  
16 corroborate how this investigation, which I  
17 was terminated, wasn't a fair and impartial  
18 and above board investigation.  
19 Q Was he retired before the investigation?  
20 A No. I -- I don't know. I can't answer that.  
21 I can't remember.  
22 Q Did he participate in the investigation?  
23 A Yes, he did.  
24 Q He did?  
25 A Yes, he did.

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1 actually go through the investigation and  
2 layout what investigative tools that they  
3 could have utilized in order to prove or  
4 disprove it, then we'll see. But I can  
5 assure you, there's not going to be a matter  
6 of opinion.  
7 Q Okay. All right. Ray Domingue, I guess the  
8 payroll investigation?  
9 A Payroll investigation, the AD-2012.  
10 Q 007?  
11 A Yes. The grievance procedure, as far as what  
12 happens.  
13 Q He didn't file a grievance, did he?  
14 A No. He was going to testify as to the  
15 grievance procedure, and basically say what  
16 normally happens.  
17 Q All right. Dee Stanley?  
18 A Mr. Stanley, CAO, he's going to be a witness  
19 as far as what compelling evidence that would  
20 make him the complainant, and what statement  
21 that he provided to definitely say that Greg  
22 Cormier was an individual that was involved  
23 in releasing that document to Olita Magee.  
24 Q Well, you told us today more than once, on  
25 the record, under oath, that you're the one

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1 Q How so?  
2 A He cooperated in the investigation like any  
3 other officer that was the subject of an  
4 investigation.  
5 Q Okay. Anything else?  
6 A No.  
7 Q Rick Zeno?  
8 A Rick Zeno sat on the old review board. He  
9 was also present and have knowledge of the  
10 Bert Bejsovec payroll fraud. He was also  
11 present when I expressed my concerns about  
12 how the investigation was conducted, in which  
13 it wasn't proper. And Mr. Domingue wasn't --  
14 didn't have expertise to properly  
15 investigate.  
16 Q That's your opinion?  
17 A No, sir, it's not my opinion.  
18 Q Sure, it is. Because the CAO charged him  
19 with the duties to do and that and he  
20 conducted the investigation.  
21 A No, sir. It's still in limbo. Mr. Domingue  
22 doesn't have no investigative background  
23 compared to me.  
24 Now, when the civil service hearing  
25 takes place, where they decide, and I

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1 that copied it, whited it out and gave it to  
2 Scott Poiencot. So you can't deny your  
3 involvement.  
4 A No, sir.  
5 Q Can you?  
6 A The --  
7 Q Wait, wait. Answer my question.  
8 You can't deny your involvement, can  
9 you?  
10 A Yes, I'm going to deny my involvement.  
11 Because if you refer back to the termination  
12 letter, and if you'd like, we can. The -- in  
13 the letter, it says, I released the document  
14 to Olita Magee, not Scott Poiencot.  
15 Q Okay.  
16 A Do you want to refer to it?  
17 Q I don't need to refer to it.  
18 A Okay. Well, I will, for the record.  
19 Q The document speaks for itself.  
20 A And that --  
21 Q You don't need to read it into the record,  
22 and I'm not asking you a question on it now  
23 because I already have asked you a bunch of  
24 questions on it.  
25 A Well, you asked --

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1 Q Anything else on Dee Stanley?

2 A You asked the question that I was involved,  
3 and that's the reason why he did it.

4 The problem is, when did he become aware  
5 of it, and who provided him with that  
6 information? And why he authorized that  
7 investigation as opposed to Chief Craft, and  
8 why didn't Chief Craft do it.

9 Q You ought to know the answers to those  
10 because y'all filed a TRO to stop the  
11 investigation, right?

12 A Why would I know the answers? Mr. Stanley  
13 was never deposed and asked those questions,  
14 Mr. Corry, was he?

15 Q Why was the TRO filed then?

16 A Because it was -- from the onset, it was  
17 conducted where Keith Gremillion -- you  
18 deposed Keith Gremillion, he had knowledge.

19 Q For the record, I've never deposed Keith  
20 Gremillion.

21 A You never deposed Keith Gremillion?

22 Q I never have deposed him.

23 A You never have? At any time dealing with the  
24 document?

25 MR. SPRING:

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1 involvement in the document being produced to  
2 her by me, as well as Scott Poiencot. Even  
3 though he had that knowledge, he continued  
4 the investigation, which clearly shows that  
5 we were targeted from the onset.

6 Q All right. Kim Baer, anything about her,  
7 that's the city nurse, that we haven't  
8 already talked about?

9 A Kim Baer is going to verify the incident  
10 involving my racing heart, for which I was  
11 placed on administrative leave.

12 Q All right. Luwanda Sheer?

13 A Luwanda Sheer is going to be pretty much  
14 similar to Kim Baer. She's going to have  
15 some information as far as dialogue between  
16 herself, Kim Baer, Chief Craft, in relation  
17 to the administrative leave, as well as the  
18 fit for duty.

19 Q All right. Sean Terro?

20 A Sean Terro provided me with the  
21 predetermination notice that was allegedly  
22 authored by Mr. Domingue. So he's going to  
23 have some type of information on that, as  
24 well as --

25 Q 2012-007?

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1 It's a different term of art.

2 A Huh?

3 MR. SPRING:

4 The testimony in civil service is  
5 not a deposition.

6 A Well, not deposed. Well, you had him testify  
7 in the civil service proceeding.

8 MR. CORRY:

9 Q Anything else on Dee Stanley?

10 A Yes. He needs to be questioned as well about  
11 the conversation he had with Suzanne  
12 Bejsovec, and in relation to him stating that  
13 he was going to take care of me for filing a  
14 complaint on Bert Bejsovec and embarrassing  
15 the family.

16 Q All right. Anything on Dwayne Prejean we  
17 have not already covered?

18 A Yes.

19 Q What?

20 A He needs to be a witness, and we need to know  
21 exactly how he conducted the investigation.  
22 Was it a fair and impartial investigation?  
23 Did he have a conversation with Olita Magee  
24 on three separate occasions in which, from  
25 the onset, she was told that we had no

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1 A Yes.

2 Q All right. Anything else on Sean Terro?

3 A As far as I know.

4 Q Cornell Montgomery?

5 A That's dealing with the administrative leave  
6 issue, and the polygraph.

7 Q Mark Francis?

8 A Mark Francis, he's going to be a witness to  
9 provide information on the retaliation in  
10 which the chief had it out for me starting  
11 way back from Glen Dartez. There's audio  
12 recordings to corroborate that.

13 Q Do we have copies of those?

14 A Yes, sir.

15 As well as him being a witness in which  
16 there's an audio recording of Dwayne  
17 Arceneaux referencing Mark Francis, telling  
18 him that they're going to come after Greg  
19 behind the payroll fraud complaint.

20 Q All right. David Leblanc?

21 A David Leblanc.

22 Q We talked about him.

23 A No.

24 Q Right?

25 A No, sir.



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1 Q I thought we talked about him yesterday.  
2 A No, sir.  
3 Q Okay. What does he have to do with this?  
4 A David Leblanc was involving the Glen Dartez  
5 incident.  
6 Q Is he an officer?  
7 A I take that back. We did talk to him a  
8 little bit in reference to the chain of  
9 command, as far as reporting it.  
10 Q Correct. All right.  
11 A And that's going to be -- there's an audio  
12 recording of David Leblanc discussing how the  
13 reporting of Glen Dartez, the sequence of  
14 events, and how it occurred, and what  
15 happened.  
16 Q Do we have that recording?  
17 A Yes.  
18 Q All right. Lance Leblanc?  
19 A I'm -- it's not David Leblanc. I'm mistaken.  
20 Lance Leblanc is going to be the one you're  
21 referring to, as opposed to 17. 17 is going  
22 to be what I just mentioned about the  
23 recording.  
24 Q Okay.  
25 A You got that?

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1 misconduct by Glen Dartez.  
2 And the only reason they went after me  
3 was because Chief Craft and Glen Dartez, they  
4 were personal friends. They had been friends  
5 almost -- when they first came to the  
6 department. And plus, he was publicly  
7 embarrassed, and he thought I was  
8 responsible. So it doesn't matter if Glen  
9 Dartez retired. The issue is, I started  
10 being a target behind Glen Dartez.  
11 Q Kelly Gibson?  
12 A Kelly Gibson was the investigator in the Glen  
13 Dartez incident. He conducted an interview  
14 with me. The interview started out inquiring  
15 about --  
16 Q Well, we have a copy of your statement in  
17 your submission. We have talked about that,  
18 correct?  
19 A Yes.  
20 Q You gave us a copy of your statement.  
21 A Yes.  
22 Q All right. I don't need you to regurgitate  
23 it now.  
24 A I'm not going to regurgitate everything. We  
25 never discussed the statement --

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1 Q Yes.  
2 A All right. 16, David Leblanc. He was -- he  
3 was involved because Glen Dartez allegedly  
4 told him he was present at the scene of the  
5 homicide. He had knowledge when I told  
6 him.  
7 Q Let me cut you off.  
8 What does that have to do with your  
9 lawsuit? He retired. He was under  
10 investigation and retired, correct? The same  
11 thing Gabe Thompson did, right?  
12 A Are you finished?  
13 Q Yes. I'm asking you a question. Is that  
14 correct?  
15 A Well, I can't answer the question if you  
16 continue talking, Mr. Corry.  
17 Q All right.  
18 A Okay. Are you finished?  
19 Q Yes.  
20 A All right. What it has to do with my lawsuit  
21 is, the retaliation started with Glen Dartez.  
22 So regardless if he retired or not, that's  
23 when I became -- they put a target on my  
24 back, for Glen Dartez. Because they thought  
25 I was responsible for reporting gross

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1 Q I don't need to. I can read it.  
2 A No. The point I'm trying to make is, they  
3 were more concerned about a document, and if  
4 the report was released, and if I did it.  
5 And that's why he's listed. And his  
6 knowledge of what actually occurred.  
7 Q And you told us, I think more than once, that  
8 you did not release anything to the news  
9 media regarding the Dartez incident.  
10 A That is correct.  
11 Q Okay. Or anybody else. Nothing released to  
12 the news media, and nothing released to  
13 anybody else, other than official police  
14 business, regarding the Dartez incident,  
15 correct?  
16 A Is that a question?  
17 Yes. That's correct. Didn't release  
18 it.  
19 Q All right. Guy Lebreton?  
20 A Guy Lebreton, he's a witness behind the Glen  
21 Dartez incident. He approached me in the  
22 parking lot of the police department after  
23 patrol discovered that that had occurred.  
24 And he mentioned that he was going to report  
25 it. And I don't know if he did or not.

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1 But he came to me because he knows --  
2 because of my reputation in telling the  
3 truth, he knew I was going to tell him if  
4 that occurred or not.  
5 Q Okay. Jason Boudreaux. I guess that's Board  
6 Chairman Jason Boudreaux?  
7 A Yes, sir.  
8 Q What's he going to testify about?  
9 A He's going to testify about the stay order,  
10 the AD-2012-007, wherein Chief Craft went in  
11 and asked for an extension, in which he's  
12 going to verify one of the reasons he had  
13 this document was supposedly be authenticated  
14 by the secret service, which I know had never  
15 happened.  
16 Q All right. Richard Chappuis?  
17 A Mr. Chappuis, he's going to be a witness  
18 because of the conversation that took place  
19 outside of civil service, where he said the  
20 grievance procedures is useless because the  
21 CAO is always going to side with the  
22 directors.  
23 And he also referenced that Internal  
24 Affairs can manipulate the polygraph to get  
25 the results that they want.

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1 Shunick, and some other people?  
2 A He's going to discuss about Bradley Wilson,  
3 who was the person that they thought was the  
4 target officer. And that was from an  
5 interview he had with the radio station and  
6 they brought him in. He submitted to a  
7 polygraph by -- administered by Joey Provost,  
8 in which he failed. And then, he also  
9 submitted to a CVSA, in which he failed. But  
10 he was the key suspect in the Mickey Shunick  
11 case.  
12 And Brandon Scott Lavergne confessed to  
13 committing the murder.  
14 Q That's the guy in Angola?  
15 A I don't know where he's at, Mr. Corry.  
16 Q All right. Scott Poiencot, anything else you  
17 need to add to him? I'll get an opportunity  
18 to depose him here shortly, I hope.  
19 A No.  
20 Q Bradley Wilson?  
21 A He's the guy Reginald Thomas references  
22 failed the polygraph and the CVSA, two  
23 investigative tools the Lafayette City Police  
24 Department utilizes.  
25 Q He was the suspect one time in Mickey

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1 Q All right. Dwayne Arceneaux we've talked  
2 about?  
3 A Yes.  
4 Q Okay. Chuck Huebner we've talked about?  
5 A We talked about him, not in great detail. We  
6 never talked about him as far as why he's  
7 listed as a witness. He's listed as a  
8 witness because he's going to verify that I  
9 never met him at all, with the exception of  
10 one time, and I don't know if he remembered  
11 me, is when I came back from Desert Storm,  
12 Desert Shield, he interviewed me.  
13 Q Have you talked to him about this lawsuit?  
14 A No, sir.  
15 Q All right. Reginald Thomas?  
16 A Reginald Thomas.  
17 Q I think we talked about him.  
18 A He's going to verify the conversation that we  
19 had at Piccadilly, myself, and Gabe Thompson,  
20 in which he discussed how horrible the Mickey  
21 Shunick investigation was being conducted by  
22 Stephen Bajat.  
23 And he's also going to discuss how --  
24 Q Isn't there a guy at Angola that pled to  
25 three life sentences for the death of Mickey

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1 Shunick's death?  
2 A Yes.  
3 Q Have you ever had one suspect and after --  
4 during your investigation that changes to  
5 another, in your 22 years of police work?  
6 A Yes.  
7 Q You don't always get the right guy the first  
8 time, do you? That's why we have  
9 investigations, correct?  
10 A No. But the -- that's why we have  
11 investigations.  
12 But the relevance is, they thought he  
13 was lying, so they requested that he  
14 cooperate in the investigation and take a  
15 polygraph test. He failed that polygraph  
16 test. He failed it miserably, according to  
17 Reginald Thomas. And they still didn't  
18 believe him. So they did a secondary test,  
19 which is another investigative tool that the  
20 police department utilizes in the criminal,  
21 as well as administrative. And he failed  
22 that test, also.  
23 Q All right.  
24 A I failed one, but passed the other. The same  
25 tests.

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1 Q Doug McDermott?  
2 A Doug McDermott is going to testify as well as  
3 Chuck Huebner, the same thing.  
4 Q Pat Ottinger?  
5 A Pat Ottinger is going to testify, which I  
6 don't know -- that Chief Craft consulted with  
7 him to release the BR's investigation.  
8 Q So you think you're going to get the city's  
9 attorney to waive the attorney-client  
10 privilege in advising his clients of matters  
11 and testify in court?  
12 A I list him as a witness. Now, that -- that  
13 would be up in the air as far as if that's  
14 going to happen or not, Mr. Corry.  
15 Q Do you think the federal judge is going to  
16 ask that the attorney-client privilege be  
17 waived?  
18 A I don't know what the federal judge is going  
19 to ask, Mr. Corry. I can't think of a  
20 determination that the judge is --  
21 Q So the only reason you've listed Pat Ottinger  
22 is for his communications with his clients,  
23 to include Chief Craft?  
24 A No.  
25 Q What else, then?

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1 well, right?  
2 A Yes.  
3 Q The board's attorney.  
4 A That's correct.  
5 Q And you're trying to get her to waive her  
6 attorney-client privilege to her clients? Is  
7 that the reason she's listed?  
8 A It's not for her clients. It's for the  
9 implementation of that stay order, which was  
10 discussed in a public meeting.  
11 Q So what is it that she's going to give you?  
12 A So if that's attorney-client privilege, I  
13 don't know why she was discussing it in open  
14 forum.  
15 Q All right. Mac Gallien, I think we talked  
16 about him yesterday.  
17 A Mac Gallien is going to correlate the Glen  
18 Dartez incident, and he's going to be posed  
19 questions as far as why it wasn't reported  
20 through the chain of command, to the chief,  
21 in which general orders compel them to do.  
22 And Chief Craft has stated on more than  
23 one occasion, he hold his supervisors,  
24 particularly people of higher rank, to a  
25 higher standard. And that was never done.

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1 A It's not only his communications. It's to  
2 show that Chief Craft testified and said he  
3 consulted with Pat -- not with Pat Ottinger,  
4 he consulted with Michael Hebert, who was the  
5 city attorney at the time, when it was  
6 actually Mr. Ottinger.  
7 Q Okay.  
8 MR. CORRY:  
9 And Steve, he's not the only lawyer  
10 noted. I think my name appears in some  
11 of them. I think that needs to be  
12 discussed and rethought before we take  
13 it up with the Court.  
14 MR. CORRY:  
15 Q Pat Ottinger -- or excuse me. Mike Hebert is  
16 the same thing?  
17 A Yes, sir.  
18 Q That's the city attorney, current City  
19 Attorney Mike Hebert?  
20 A Is that a question you're asking me?  
21 Q Yes. That's it.  
22 A Yes.  
23 Q I want to make sure it's the same name, Mike  
24 Hebert.  
25 Candice Hattan, that's an attorney as

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1 Nor was he ever disciplined. Nor did Chief  
2 Craft ever launch an investigation on that.  
3 Q All right. Brandon Hargrave, this is the  
4 third party that's being brought into this  
5 lawsuit that really has nothing to do with  
6 it?  
7 A Brandon Hargrave is listed because of the JD  
8 investigation in which I received retaliation  
9 afterwards.  
10 Q All right. Randy Vincent?  
11 A Randy Vincent is going to be a variety of  
12 reasons.  
13 JD investigation is one and two, as far  
14 as what occurred in both of them. The letter  
15 of reprimand, the Glen Dartez. Why he didn't  
16 report it? He was afforded preferential  
17 treatment. And an investigation wasn't  
18 conducted on him due to his close  
19 relationship.  
20 Q That's not accurate. You've got documents  
21 that show that an investigation was  
22 conducted.  
23 A On him for failing to report it to Chief  
24 Craft. The incident occurred in June.  
25 Q Did you file a complaint with anybody?

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1 A About what?

2 Q On Randy Vincent?

3 A I didn't need to. The chief is aware of

4 general orders that governs him to do

5 something, and it was brought to his

6 attention by others.

7 Q So the answer to my question, was no, you did

8 not file a complaint on Randy Vincent?

9 A No, sir, not at the time, because there's

10 reprisals for filing a complaint, especially

11 for someone who has a close relationship with

12 Chief Craft.

13 Q Ted Vincent?

14 A Olita Magee. The document, the conversation

15 he had with Scott Poiencot, the recordings

16 where they were secretly listening in on

17 people's conversation without their consent,

18 in which he discussed that in a conversation

19 with Scott Poiencot.

20 The way Internal Affairs was being run,

21 as far as how they were conducting

22 investigations on officers, in which officers

23 were purposely lied in an attempt to coerce

24 them to admit to something, even though they

25 never had any compelling evidence.

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1 Q Acadiana High, as well?

2 A Yes. Also, there's going to be a current one

3 with Andres Landor, in which he was accused

4 the same thing.

5 If I'm not mistaken, there's a lawsuit

6 that's pending right now in which Andres

7 Landor is the -- filed the lawsuit because he

8 felt that they didn't properly investigate an

9 investigation.

10 Q Luke Walker, is that the Assistant US

11 Attorney Luke Walker?

12 A Yes.

13 Q Another attorney?

14 A Yes.

15 Q What's he going to add to this?

16 A He was aware of the incident involving

17 Stephen Bajat. Luke -- Mr. Walker initially

18 contacted Stephen Bajat.

19 Q Andres Landor?

20 A Andres Landor is going to testify to

21 reprisals similar to ours. He filed a

22 complaint against --

23 Q Does it have anything to do with you?

24 A Yes.

25 Q What?

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1 He referenced an incident where

2 Lieutenant Prejean was instructing his IA

3 investigators to lie and say they have

4 statement from a complainant, or a video, in

5 order to compel them to confess to an

6 incident even though they didn't have it at

7 the time. And basically, how he had that

8 information, or where did he get that

9 information that Chief Craft made a deal with

10 Allyson Prejean to -- for her to stop

11 representing officers in order for Dwayne to

12 be placed in Internal Affairs.

13 Q All right. That's another third party that

14 we're bringing into this that's not part of

15 this lawsuit. That's the Allyson Prejean

16 you're talking about, right?

17 A She interjected herself in the lawsuit.

18 Q Okay. I want to make sure I understand who

19 you're referring to.

20 A I understand.

21 Q Jim Craft, we talked about him.

22 A Yes.

23 Q Stephen Bajat, we've talked about him.

24 That's the Mickey Shunick incident?

25 A Not only Mickey Shunick.

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1 A I'm about to tell you.

2 It's similar, because he's a black

3 officer. He reported misconduct and he was

4 retaliated against.

5 At the time he reported it, and because

6 you said it's a matter of public record, I'll

7 just say the initials of the officer. The

8 officer is SB, who was having inappropriate

9 relationship with a known prostitute.

10 Q S what?

11 A SB. You did say, don't say his name.

12 Q Well, if they're not -- you know, the federal

13 judge has spoken on that, so I just don't

14 want to get -- (Interrupted)

15 A Yeah. But I don't want to blurt it out and

16 it's on the record.

17 Q Right.

18 A So that's why I wanted some clarification.

19 Q All right.

20 A In which he had -- he reported the incident

21 in 2010, or it was reported in 2010, and

22 brought to Chief Craft's attention, with Ted

23 Vincent and another officer, Kent Uzbie. And

24 the chief basically told him in his office,

25 that -- don't say anything, and it doesn't



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1 leave this area.  
2 The female that he was -- SB was  
3 involved in lodged a complaint. And sometime  
4 during the summer of last year. And the  
5 complaint was white-washed. And then, he was  
6 retaliated against. And he's going to  
7 testify as far as what happened.  
8 Q All right. Ron Czajkowski, we have talked  
9 about, correct?  
10 A Yes. Ron Czajkowski is going to provide  
11 information on the JD -- oh, could you --  
12 Q Yes, take that off. Make it JD.  
13 A JD, both investigations. The Bert Bejsovec  
14 investigation.  
15 Q All right. Todd Alcorn?  
16 A Mr. Corry, can I ask you a question?  
17 Q Sure.  
18 A I know it might be really -- it might be a  
19 crazy question.  
20 Why would you say Bert Bejsovec's name  
21 instead of just -- okay. All right. I just  
22 want to --  
23 Todd Alcorn. I listed Todd Alcorn, but  
24 I'm afraid now that I listed him there might  
25 be some reprisals.

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1 several white officers --  
2 Q Do you know if he appealed that?  
3 A No. I'm not 100 percent sure.  
4 Q Because if he didn't appeal it, it's private.  
5 A It's not private if he's willing to discuss  
6 it.  
7 Q It's absolutely his right.  
8 A Yes.  
9 Q But I don't know if we have that information  
10 here.  
11 A I have him down here, because I had a  
12 discussion with him and he has no qualms of  
13 testifying.  
14 Q Okay.  
15 A And several officers did the same thing, and  
16 received a one and two-day suspension, but  
17 they were white officers.  
18 Q All right. Kenneth Hardy?  
19 A Kenneth Hardy. Kenneth Hardy is going to  
20 testify that he received a three-day  
21 suspension for allegedly --  
22 Q Did he appeal that?  
23 A Yes, he did.  
24 Q And I think it was dismissed before there was  
25 a hearing.

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1 Todd Alcorn is going to -- I wanted him  
2 to be a witness because -- because of our  
3 friendship, they started some investigations  
4 on him, and for allegedly releasing some  
5 documents to Busted in Acadiana.  
6 Q Did he release any documents to Busted in  
7 Acadiana, that you know of?  
8 A I don't know, Mr. Corry. He was instructed  
9 not to discuss that investigation. The  
10 investigation was closed. I never inquired  
11 as far as the outcome of it. I didn't think  
12 it was a matter of importance.  
13 I know he was upset because the  
14 questions that was posed in Internal Affairs,  
15 he told me was geared towards me being -- him  
16 being friends with me. And they were trying  
17 to find out if he was communicating  
18 information to me.  
19 Q Mike Brown?  
20 A Mike Brown is going to testify to despaired  
21 treatment in which black officers receive a  
22 harsher treatment versus whites.  
23 Mike Brown is going to attest that he  
24 received a 45-day suspension for failing to  
25 properly conduct a search of a building, and

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1 A Mr. Corry, once you appeal a -- let me. Go  
2 ahead.  
3 MR. CORRY:  
4 Let's go off the record for a  
5 second.  
6 (DISCUSSION HELD OFF THE RECORD)  
7 MR. CORRY:  
8 Q Let's go back on the record.  
9 All right. Zeryk Guillory. I know what  
10 that's about. That's the -- they tried  
11 something in civil service. Is that the sick  
12 leave deal?  
13 A Yes.  
14 Q All right.  
15 A There's going to be one more that I  
16 omitted.  
17 Q Who is that?  
18 A You.  
19 Q Are you going to list me?  
20 A Yeah.  
21 Q Okay.  
22 MR. CORRY:  
23 We'll take that up in Court.  
24 A Okay.  
25 MR. CORRY:

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1 Do you have those complaints?  
2 MR. SPRING:  
3 Can we take five minutes to smoke a  
4 cigarette?  
5 MR. CORRY:  
6 Yes.  
7 (SHORT BREAK TAKEN FROM  
8 4:06 P.M. TO 4:15 P.M.)  
9 MR. CORRY:  
10 Q Do you know anything about the Stanley/Craft  
11 organization?  
12 A Yes.  
13 Q What?  
14 A Basically, it's an organization that its  
15 almost like Mafia style, that if you go  
16 against the machine, there's reprisals that's  
17 going to happen. You can't go against them.  
18 If you disagree with them in any form or  
19 fashion, verbally, or written, they're going  
20 to retaliate against you, by either starting  
21 investigations, transferring you, changing  
22 your working hours. And they're going to  
23 solicit the help of others in the department  
24 to do it where it doesn't directly appear on  
25 the surface that it's them actually doing it.

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1 actually, the ones I referenced earlier,  
2 GC-140 to 577, were received on February  
3 20th of 2014.  
4 And then, today, we received 578  
5 through 682, which is the documents,  
6 after comparing the exhibit book  
7 yesterday to Mr. Cormier's binder over  
8 the night, he realized that these were  
9 not in there, produced them to us.  
10 And then, yesterday, at the start  
11 of his deposition, GC-683 through 693  
12 were given to us. And I think actually  
13 they -- most, if not all of them, are  
14 included in 578 through 682.  
15 But we have them all now. I think  
16 we can agree on that.  
17 MR. SPRING:  
18 Yes.  
19 MR. CORRY:  
20 Greg, is that fair?  
21 THE WITNESS:  
22 Yes.  
23 MR. CORRY:  
24 Okay. I don't know that I need to  
25 attach all of this. I'm just going to

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1 Q Greg, we've talked for two days. Is there  
2 anything that we have not covered that is  
3 significant to the claims you've asserted in  
4 your lawsuit? I can't imagine there is,  
5 but --  
6 A That's all I can think of right now.  
7 MR. CORRY:  
8 Okay. And just for purposes of  
9 clarity with the record, Steve, since we  
10 have been produced so many different  
11 documents. GC-1 through 139 are the  
12 documents we initially received with the  
13 original discovery requests of December  
14 13th, 2013.  
15 140 through 577 is the binder that  
16 Mr. Cormier left here at one of the  
17 earlier depositions. There were some  
18 documents that he felt were included,  
19 that based on the file, or based on the  
20 binder that he gave us, they're not  
21 there. But be that as it may, since  
22 then, he has produced, or he has  
23 compared what we had and given us the  
24 documents that were not included. And  
25 those include documents received -- and

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1 keep it in a folder, it'll be 1 through  
2 693. And you should have a copy of it.  
3 If you don't, we can --  
4 MR. SPRING:  
5 Let me ask you something. When  
6 they do the Bates stamp thing like that,  
7 is there a way to cut and paste? Like  
8 is there a PDF to cut and paste it?  
9 Like, can you put it on a CD or  
10 something?  
11 MS. COREIL:  
12 We can probably -- you want a copy  
13 just like exactly we have it with the  
14 Bates numbers in the Bates sorter? We  
15 can get you a copy just like that.  
16 MR. CORRY:  
17 I can send you a complete copy.  
18 MR. SPRING:  
19 That will be great, if you could.  
20 MR. CORRY:  
21 All right. And then, I'm not going  
22 to attach them. I'm just going to  
23 attach what we have there.  
24 And I'm going to make sure that the  
25 binder, all the copies are put in there.

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1 I, Debbie G. Chaney, Certified Court  
2 Reporter, in and for the State of Louisiana, as  
3 the officer before whom this testimony was taken,  
4 do hereby certify that GREGORY CORMIER, after  
5 having been duly sworn by me upon authority of  
6 R.S. 37:2554, did testify as hereinbefore set  
7 forth in the foregoing four hundred fifty-three  
8 (453) pages; that this testimony was reported by  
9 me in the stenotype reporting method, was prepared  
10 and transcribed by me or under my personal  
11 supervision, and is a true and correct transcript  
12 to the best of my ability and understanding; that  
13 the transcript has been prepared in compliance  
14 with transcript format guidelines required by  
15 statute or by rules of the board, as described on  
16 the website of the board; that I have acted in  
17 compliance with the prohibition on contractual  
18 relationships, as defined by Louisiana Code of  
19 Civil Procedure Article 1434 and in rules and  
20 advisory opinions of the board; that I am not  
21 related to counsel or the parties herein, nor am I  
22 otherwise interested in the outcome of this  
23 matter.

DEBBIE GIDDINGS CHANEY, CCR  
LOUISIANA CERTIFICATION NO. 90023

01

LAFAYETTE POLICE DEPARTMENT  
INTEROFFICE COMMUNICATION  
SL NOTICE/INSTRUCTIONS

TO:	DIVISION:	Patrol
FROM: Sgt. Keith J. Gremillion	OFFICE:	Internal Affairs
SUBJECT:	DATE:	

Major,

Chief of Police James Craft has ordered a shift-level administrative investigation relevant to a complaint filed by \_\_\_\_\_. The investigative tracking number that has been assigned to this shift-level administrative investigation shall be SL-\_\_\_\_\_. Below is general instructions/information for you to follow:

This investigation and disciplinary action if any ~~must~~ be completed within 60 days. If you foresee a delay you must either get a 30-day extension from the employee(s) under investigation or notify the Chief's office to petition the Lafayette Fire and Police Civil Service Board for an extension. The starting date for this investigation is \_\_\_\_\_.

Any related case documents generated during this shift-level administrative investigation should reflect the above case number.

At the conclusion of the investigation, please forward the original completed product to the office of Internal Affairs.

The investigation packet will be presented to Chief James Craft for review. He will determine the disposition and respond to the reporting party through his or designee's office.

In the event the Chief of Police convenes the Department's Pre-Disciplinary Review Board to review this investigation his office will assume this task.

If you should need anything else please do not hesitate to contact me or any of the Internal Affairs personnel.

Thanks,

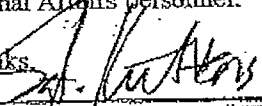
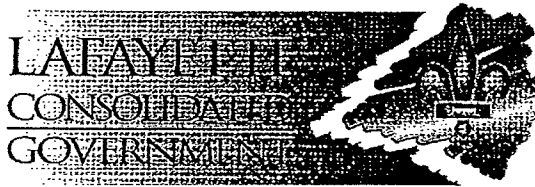
  
Sgt. Keith J. Gremillion #673

Exhibit "A"



D3

COPY



POLICE DEPARTMENT

TEL: (337) 291-8600  
900 E. UNIVERSITY AVE.  
P. O. BOX 4308  
LAFAYETTE, LOUISIANA 70502

September 12, 2012

Lieutenant Gregory J. Cormier (3120-8564)  
Lafayette Police Department  
900 E. University Ave  
Lafayette, LA 70503

Lieutenant Cormier:

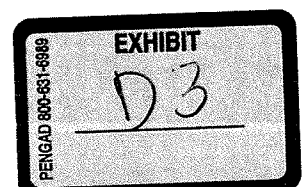
An Internal Affairs investigation (AD2012-007) was completed regarding an allegation of employee misconduct in reference to official, confidential, interoffice communication originating in the Internal Affairs Unit being copied and/or removed from the Lafayette Police Department (LPD) and given to a local attorney without appropriate permission or authorization. Additionally, during the course of this investigation, confidential information contained in Shift-Level investigation (SL 2011-028) was published in a federal lawsuit signed and verified by you. Furthermore, a public website created for and/or on behalf of you was launched on the Internet.

A pre-disciplinary hearing was held on September 7, 2012 wherein you provided a verbal statement. In reference to all allegations cited, you stated "I did not do it."

The Internal Affairs investigation report and your verbal statement as provided at the pre-disciplinary hearing was carefully reviewed and considered. It was noted that your verbal statement provided at the pre-disciplinary hearing was inconsistent with your statement provided to Internal Affairs. During the Internal Affairs investigation, you admitted that you copied Internal Affairs documents related to administrative or shift level investigations. You could not recall the number of times you had copied confidential documents. You also admitted to Internal Affairs that you had released internal documents to an unauthorized person on one occasion. You released the subject document to Corporal Scott Poiencot without any authorization. The subject document which had been obliterated was taken from a Shift Level investigation (SL2011-028) of which you were the investigating officer. All identifying information contained in said document had been redacted except for the LPD Internal Affairs Sergeant's signature. The altered document or a copy thereof was provided to a local attorney who represented a LPD officer in a Municipal Fire and Police Civil Service appeal hearing. Subsequently, the attorney used the document as an exhibit in a legal brief which was presented before the Municipal Fire and Police Civil Service Board.

Although you asserted that you gave Corporal Poiencot the document because you believed it contradicted the policies and procedures followed in the past, at no time did you attempt to discuss your concerns about the subject document with your superior officers, nor did you file a formal grievance or request a discussion on the matter before the Municipal Fire and Police Civil Service Board. Instead, you chose to take matters into your own hands and released the document without authorization.

I have sustained the complaint of employee misconduct. Your recent actions were deemed to constitute violation of the following:



Lt. Gregory J. Cormier

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9-12-2012

## **LAFAYETTE CONSOLIDATED GOVERNMENT POLICY AND PROCEDURES**

### **PPM: 2161-2: Conditions of Employment**

#### **2. Prohibitions**

- 2.7 "Unauthorized removal or use of any official correspondence, record, computer file, e-mail or report from any LCG building, office or file."
- 2.28 "Conduct deemed unbecoming of an employee of the LCG in dealing with fellow employees, supervisors, and superiors, and/or members of the public."

## **LAFAYETTE POLICE DEPARTMENT GENERAL ORDERS:**

### **G.O. 201.2 PROFESSIONAL CONDUCT AND RESPONSIBILITIES**

#### **Professional Conduct**

- J. "Employees shall not perform any actions which disrupt the performance of official duties or which tend to interfere with reasonable supervision and discipline."

#### **Responsibilities**

- C. "Employees shall abide by all Federal, State, and Local Ordinances, as well as, LCG PPM's, Department Written Directives, General Orders, Standard Operating Procedures, and rules of the Civil Service Board."

#### **Attention to Duty**

- C. "Employees, whether on or off duty, shall follow the ordinary and reasonable rules of good conduct and behavior. They shall not commit any act in an official or private capacity that would bring reproach, discredit, or embarrassment to their profession, the Department, or which could constitute conduct unbecoming by an employee. Employees shall follow established procedures in carrying out their duties, and shall at all times use sound judgment."

#### **Reporting to Supervisor**

- A. "Every employee shall seek to protect the integrity of the Department."

### **G. O. 204.5 DEPARTMENTAL DISCIPLINE**

#### **Category 3 Offenses**

##### **3:5 Unauthorized Public Statements**

"Except as specified in General Order 305.1, no employee shall be authorized to release information to the news media, except as authorized by the Chief of Police."

##### **3:8 Confidentiality**

"All departmental business is to be considered confidential and no employee shall release any information to any non-law enforcement entity without proper authorization. No employee shall make known to anyone a proposed action of the Department or the details of any police action/operation."

Lt. Gregory J. Cormier

page 3

9-12-2012

**G. O. 301.9 INTERNAL INVESTIGATION, RESPONSIBILITY OF DEPARTMENT PERSONNEL TO COOPERATE**

**Confidentiality Policy**


- A. "The Internal Affairs Section shall be responsible for recording, registering, supervising, and controlling all records, reports, documents, information and items that are part of an Internal Affairs investigation. Information or copies of internal investigations shall not be furnished to anyone without permission from the Chief of Police. Internal investigations will be kept in the secure confines of the Internal Affairs Section with only employees of the Section having access to the files unless otherwise directed by the Chief of Police. (CALEA – 52.1.2)"

I also reference the **Louisiana Municipal Fire and Police Civil Service Rules: LA. R. S. 33:2500: Corrective and Disciplinary Action for Maintaining Standards of Service:**

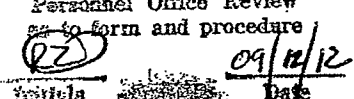
- A. "The tenure of persons who have been regularly and permanently inducted into positions of the classified service shall be during good behavior. However, the appointing authority may remove any employee from the service, or take such disciplinary action as the circumstances warrant in the manner provided below for any one of the following reasons"
3. "The commission or omission of any act to the prejudice of the departmental service or contrary to public interest or policy."

As an employee of the Lafayette Police Department, your actions reflect upon the reputation and image of the organization and our community, at all times whether on or off duty. You must understand that as public servants we are hired to provide and/or perform services in an efficient and professional manner for the citizens, which we serve. As a Lieutenant, it is crucial that your actions demonstrate sound judgment and portray good decision-making. Your recent actions have demonstrated dishonesty and untruthfulness and tainted your trustworthiness which has caused embarrassment and projected a negative image upon the reputation and integrity of the Lafayette Police Department and our Officers. This level of performance is unacceptable, as it is counterproductive to the mission of the Lafayette Police Department which is an integral part of the Lafayette Consolidated Government.

I would be remiss in my duties, as the Police Chief, to uphold the accountability and integrity of the Lafayette Police Department and our Officers, if I did not administer disciplinary action. Due to the seriousness of your recent actions, I find it in the best interest of the Lafayette Police Department and the Lafayette Consolidated Government to terminate your employment. This letter is your *official notification* that **your employment with the Lafayette Police Department is terminated effective September 12, 2012.** As you are aware, the Municipal Fire and Police Civil Service Rules provide you a right to appeal this action. If you wish to appeal, you must submit a written request to the Fire and Police Civil Service office within fifteen (15) days.

  
Jim Craft  
Police Chief

C: City-Parish President, L. J. Durel, Jr.  
Chief Administrative Officer, Dee Stanley  
Chairman, Municipal Fire and Police Civil Service Board  
State Examiner, Municipal Fire and Police Civil Service Board  
Secretary, Municipal Fire and Police Civil Service Board  
Human Resources

Personnel Office Review  
as to form and procedure  
  
Date 09/12/12

